



European Union Network for
the Implementation and Enforcement
of Environmental Law

Management Reference Book for Environmental Inspectorates

FOREWORD

The European Union Network for the Implementation and Enforcement of Environmental Law is an informal network of the environmental authorities of EU Member States. The European Commission is also a member of IMPEL and shares the chairmanship of management meetings.

The network is commonly known as the IMPEL Network
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The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on certain of the technical and regulatory aspects of EU environmental legislation. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. It promotes the exchange of information and experience and the development of greater consistency of approach in the implementation, application and enforcement of environmental legislation, with special emphasis on Community environmental legislation. It provides a framework for policy makers, environmental inspectors and enforcement officers to exchange ideas, and encourages the development of enforcement structures and best practices.

Information on the IMPEL Network is also available through its web site at:
<http://europa.eu.int/comm/environment/impel>

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Management Reference Book for Environmental Inspectorates	Report number: 12
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<p>Executive Summary</p> <p>This report is concerned with management of environmental inspectorates. The Reference Book illustrates practical management solutions to challenges faced by environmental inspectorates. The text is supported by examples of good practice compiled from many European countries. The report is divided into seven main chapters each dealing with one of the main organisational elements identified by the working group:</p> <ul style="list-style-type: none"> • Mission, vision, and values, providing important guidance for the organisation. • Strategy that sets out how organisational goals are to be achieved. • Managerial style - embracing communication, delegation, motivation, involvement etc. • Human resources: Staff resources, development of staff competences • Culture, defined as something common for a group, something that makes the organisation stick together. • Structure, the formal and informal division and co-ordination of activities and responsibilities. • Systems concerning activities, communication and decision-making. <p>The report stresses that the organisational elements are closely interrelated in a dynamic entity.</p> <p>The report seeks to illustrate the complexity of the management task in an environmental inspectorate while at the same time aiming at easing this task by illuminating the most important organisational elements and by providing practical solutions to the managerial challenges. It does not attempt to prescribe "best management" of inspectorates, as each inspectorate decides its management approach considering the specific political, environmental, economic, social and cultural situation constituting the inspectorate context.</p> <p>The Reference Book has been financed by the participating countries and the Commission.</p>	
<p>Disclaimer This Management Reference Book for Environmental Inspectorates is the result of a project within the IMPEL Network. The content does not necessarily represent the view of the national administrations or the Commission.</p>	

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Summary

This Reference Book is concerned with the management and process of organising, re-organising and continuously developing environmental inspectorates.

The Reference Book is targeted towards managers at all regulatory levels. The Reference Book illustrates practical management solutions to challenges faced by environmental inspectorates. It does not attempt to prescribe “best management” of inspectorates, as each inspectorate decides its management approach with a view to the specific political, environmental, economic, social and cultural environments constituting the inspectorate context. The text is supported by examples of good practice compiled from many European countries

The Reference Book is divided into seven main chapters, each dealing with one of the key organisational elements identified by the IMPEL project group:

By explicitly expressing the inspectorate **mission** (why are we here – for example “to provide efficient and integrated environmental protection”), **vision** (which long-term situation are we aiming at – for example “industrial manufacturing and sustainable growth in the region”) and **values** (guidelines for behaviour – for example “competence, impartiality, fairness and transparency”), the organisation provides important direction and guidance for its work.

The Reference Book describes how to prepare an inspectorate **strategy** that sets out how organisational goals are to be achieved. Preparation of a strategy serves several functions:

- It helps management clarify and focus the inspectorate’s development in the light of vision, mission and values.
- It illustrates the inspectorate’s objectives and success criteria for both management and staff.
- It offers a benchmark against which actual performance can be measured and reviewed.
- It offers transparency and clarity to regulators, the regulated and other stakeholders.

The managerial style - embracing communication, delegation, motivation, involvement etc. – is crucial in determining the effectiveness and efficiency of the inspectorate. The Reference Book deals among others with the importance of distinguishing between leadership tasks and management tasks.

Of evident importance is the question of **personnel**: Does the inspectorate have adequate human resources (staff number and competencies) at its disposal, enabling it to carry out the tasks laid down in the strategy and distributed through the structure? In addition, how does the inspectorate identify changing competence requirements and deliver development of staff competences?

Culture is in this context defined as common for a group, something that makes the organisation stick together: physical arrangements, ways of communication, traditions, histories, implemented values, assumptions, paradigms. The organisa-

tional culture can be guided in a desirable direction by deliberate development of values, managerial style and personnel policies.

The **structure** of the inspectorate can be defined as the formal and informal division and co-ordination of activities and responsibilities. The main structural challenges concern the distribution of roles, decision mandate, and fields of knowledge within the inspectorate, including the national and sub-national level.

Systems comprise internal processes and procedures concerning activities, communication and decision-making that form the basis of the daily and longer-term functioning of the inspectorate. Systems could include the following processes:

- Compliance assessment and enforcement.
- Permitting.
- Monitoring the environmental performance of polluting installations.
- Monitoring ambient environment / state of the environment.
- Monitoring performance of the inspectorate.
- Handling appeals and complaints.
- Networking, co-ordination and exchange of good practice and information with other authorities and institutions.
- Reporting.
- Financial issues, including budgeting and issuing fees and fines.
- Communication to different customers and stakeholders.

The Reference Book strongly emphasises that the organisational elements are closely interrelated in a dynamic entity. All elements are interdependent, that is:

- Changes implemented within one organisational element imply consequences for other organisational elements.
- If the manager seeks improved organisational performance, it is rarely sufficient to focus on one or only a few of the organisational elements.

The Reference Book seeks to illustrate the complexity of the management task while at the same time aims at easing this task by analysing the most important organisational elements and following by providing practical solutions to the managerial challenges.

1 Introduction

This ‘Management Reference Book for Environmental Inspectorates’ is concerned with the management of environmental inspectorates and the process of organising, re-organising and continuously developing these organisations¹. The Reference Book is targeted at managers at all regulatory levels; state, regional and local authorities employing from a few to one hundred or more employees.

Inspection work contributes to increased environmental and industrial performance by balancing control and enforcement of polluting installations with information on more environmentally sound activities and new technologies.

The Reference Book illustrates practical management solutions to different challenges faced by environmental inspectorates. The text is supported with examples on good practice compiled from many European countries. The Reference Book does not attempt to prescribe “best management” of inspectorates, and it does not intend to address general management issues.

Each inspectorate will decide its approach considering the political, environmental, economic and social situation constituting the inspectorate context. Differences between countries and national/sub-national levels are considerable. An example of this is, that whereas in the UK² separate sub-national visions are formulated for England and Wales, Scotland and Northern Ireland, in Sweden each local authority is expected to formulate its own vision and goals within the national framework; another example is the differences among countries concerning whether permitting and inspection are attended to by one or several authorities.

The Reference Book should be seen in combination with other initiatives of IMPEL, where earlier reports deal with, for example Environmental inspection³, Compliance monitoring⁴, and Minimum criteria for qualifications of environmental inspectors⁵. IMPEL has furthermore developed a system for review of environmental inspectorates⁶. More information about IMPEL initiatives is provided at <http://europa.eu.int/comm/environment/impel/index.htm>.

¹The term Inspectorate is used as a common denominator for all authoritative bodies at national and sub-national level dealing with inspection of polluting installations. In many countries Environmental Inspectorates are also responsible for other fields of responsibility, for example nature protection or health inspection, but this reference book is not targeting these fields.

² Within the UK, the Environment Agency represents England and Wales, whereas in Scotland it is the Scottish Environment Protection Agency (SEPA).

³ IMPEL Reference Book for Environmental Inspection, 1999.

⁴ IMPEL Best Practice in Compliance Monitoring.

⁵ IMPEL Best Practices concerning Training and Qualification for Environmental Inspectors, 2003

⁶ IMPEL Review Initiative, phase 1-3, 1999-2001.

1.1 Seven Organisational Elements

In this Reference Book seven main organisational elements are described, illustrated in the model below and treated in the following seven chapters of the Reference Book⁷.

Mission, Vision & Values

By explicitly expressing the inspectorate mission (why are we here – for example “to provide efficient and integrated environmental protection”), vision (which long-term situation are we aiming at – for example “Industrial manufacturing and sustainable growth in the region”) and values (guidelines for behaviour – for example “competence, impartiality, fairness and transparency”), the inspectorate provides important direction and guidance for the organisation.

Strategy

Strategy sets out how organisational goals are to be achieved. Preparation of a strategy serves several functions:

- It helps management to clarify and focus the inspectorate’s development in light of vision, mission and values.
- It illustrates the inspectorate’s objectives and success criteria for both management and staff.
- It offers a benchmark against which actual performance can be measured and reviewed.
- It offers transparency and clarity to the regulated and other stakeholders.

Leadership and Management

The managerial style - embracing communication, delegation, involvement etc. – is of great importance in determining the effectiveness and efficiency of the inspectorate.

Personnel

Of evident importance is the question of personnel: Does the inspectorate have adequate human resources (staff number and competencies) at its disposal for carrying out the tasks laid down in the strategy and distributed through the structure? In addition, how does the inspectorate identify changing competence requirements and deliver development of staff competences?

Culture

In this context culture is defined as something common for a group, something that makes the organisation stick together: physical arrangements, ways of communication, traditions, histories, implemented values, assumptions and paradigms. The organisational culture is gradually developed as a reflected image of values, managerial style and personnel policies.

⁷ Organisations can be analysed from many perspectives. The WG has chosen this approach as it provides opportunity to deal with the most relevant management tasks.

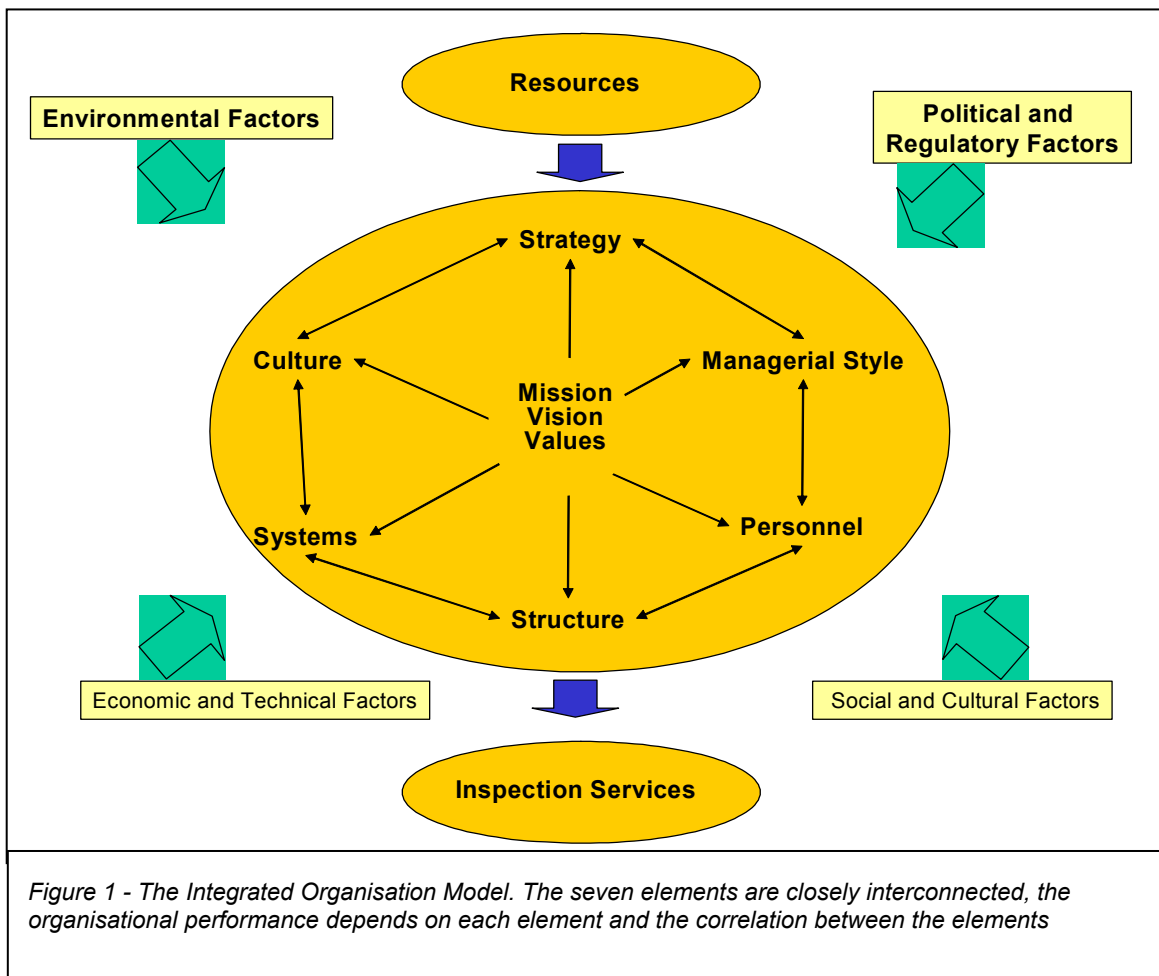
Structure

The structure of the inspectorate can be defined as the formal and informal division and co-ordination of activities and responsibilities. The main structural challenges concern the distribution of roles, decision mandate, and fields of knowledge within the inspectorate, including national and sub-national level.

Systems

Systems comprise internal processes and procedures concerning activities, communication and decision-making that form the basis of the daily and longer-term functioning of the inspectorate.

- Compliance assessment and enforcement.
- Permitting
- Monitoring the environmental performance of polluting installations.
- Monitoring ambient environment / state of environment.
- Monitoring performance of the inspectorate.
- Handling appeals and complaints.
- Networking, co-ordination and exchange of good practice and information with other authorities and institutions.
- Reporting.
- Financial issues, including budgeting and calculating fees and fines.
- Communication to different customers and stakeholders.



Integration

The organisational elements are closely interrelated in a dynamic entity as illustrated in figure 1. All elements are interdependent, that is:

- If changes are implemented within one organisational element, this implies consequences for other organisational elements.
- If the manager seeks improved organisational performance, it is rarely sufficient to focus on one element.

External factors

Many external factors are decisive for or influence the organisation and the work of the inspectorate, for example:

- The political context provides the framework for the overall vision and is decisive for the allocation of resources to the inspectorates.
- The regulatory context (national and international), including environmental licensing and the possible criminal follow up, gives the legislative framework.
- The state of the environment and international, national and regional obligations act as important guides for the priorities of the inspectorate.
- Whilst focussing on the environment, the Inspectorate should also have regard for the social and economic elements of sustainable development.
- Economic and technical conditions influence, for example the degree to which international environmental agreements can be incorporated into strategies and plans.
- Social and cultural factors, traditions, and public awareness and attitudes influence, for example the availability of skilled personnel and the specific culture of the inspectorate.

Thus, dealing with organisational development and management of inspectorates is a complex matter. It is the aim of this Reference Book to illustrate the major topics that managers should take into consideration.

1.2 How to use the Reference Book

Inspectorates in Europe face different options and barriers relating to management of the organisation.

First of all, the inspectorates are part of political administrative and regulatory systems with different approaches to inspection and enforcement and relatively different views on goals and results expected of the inspectorate. The economic aspect is part of this question, since resources normally follow political priorities.

Also, national cultural aspects set the frame for options and barriers of the respective inspectorates. Differences in culture between the countries mean that methods and tools applicable in one country are not useable in another.

The political, economic and cultural conditions are generally aspects beyond the managers' sphere of influence. This Reference Book focuses on elements *within the managers' sphere of influence* – however, appreciating the differences be-

tween countries it is clear that the individual examples, tools, and methods outlined in this Reference Book are more suitable for some inspectorates than for others.

“Good management” of a specific inspectorate depends on the particular situation and will vary over time. There is no single solution for how to manage inspectorates. The managers will have to reflect on a number of issues; this Reference Book illustrates how the issues are dealt with in different European environmental inspectorates.

2 Mission, Vision & Values

Explicit mission, vision and values when widely disseminated and understood by staff and stakeholders contribute significantly to the efficient and effective operation of the inspectorate. Typically these issues are dealt with at a central level serving as guides for the whole organisation, and where there are autonomous sub-national units these may also benefit from formulating mission statements, visions and values.

The process of developing a meaningful mission statement with vision and values is just as important as the written product. The process may include not only top planners but also (representatives from) staff and mid-level management. Thus, the staff will not only become acquainted with the mission statement – they will actually be committed to it, as it represents shared visions and values. Input of stakeholder viewpoints in the process may be of great value for the final product.

Above all technicalities – we need vision.
Scottish Environment Protection Agency

A mission statement may encompass both mission, vision and values:

Darmstadt, Germany

The way the Regierungspräsidium Darmstadt sees itself:

We

- perform a considerable contribution to the welfare for the general public and the citizens
- transpose the aims of the government and are the mediator and agent for the specialist and the regional interests
- act by law and provide an uniform application of the law
- provide to develop the diversity of the region with its potentials
- protect the natural basics of life and take care for a healthy environment

We

- plan for the development of the conurbation and the rural areas
- advice the municipalities, institutions, industries and the citizens
- grant, supervise and control corresponding to legal provisions
- intervene to put in order and help to avoid danger
- control and realise financial supports programs
- help to avoid and to solve conflicts in the region

We

- take the demands and interests our partners and clients serious and adapt to these
- are services orientated and take foresighted action
- make well balance and integral decisions
- perform high quality by engagement and specialization
- provide for transparent actions of the administration and inform precise
- represent the administration convincing and their performance reasonable

We

- act committed and work trustful together
- lead as superior purposeful and cooperative and support the employees
- think interdisciplinary and work for common solutions
- show initiative and willingness for decisions
- communicate orientated to reach a consensus and have the ability to criticise
- work orientated at the result, in awareness of the quality, rapid and cost-conscious
- are innovative and interested in advanced vocational training
- are common responsible for the way of representing the administration

The Mission Statement should be a dynamic document that is edited and elaborated on a regular basis. The process may follow a path as in Österåker, Sweden:

Österåker, Sweden

Timetable for discussion and elucidation of mission, vision and values, Österåker Inspectorate

- Staff are invited to a half day seminar with brainstorming on mission, vision and values
- Each of the three topics is discussed for 45 minutes with an initial presentation of the main idea and examples from other inspectorates Each session is opened with a 15 minutes brainstorming, all input is welcomed, no contribution is disregarded. During the following 30 minutes the ideas from the brainstorming are gathered in sub-topics and discussed. The most important items are highlighted and the substance of the discussions written down.
- In the following couple of weeks a group of staff representatives and managers formulate draft proposals for the mission, vision and values.
- The drafts are presented to the staff during a second seminar. The drafts are revised following comments from the seminar.
- The working group can finalise its work and hopefully present a committing and motivating mission statement including inspectorate vision and values.

2.1 Mission

The “mission” expresses the reason for the actual existence of the inspectorate, describing the role of the inspectorate in the national and sub-national context and expressing the organisation’s vision and values.

The environmental inspectorates’ overall mission may be expressed as “to provide an efficient and integrated environmental protection⁸ that both improves the environment and contributes to sustainable development”. A balance must be struck between social, economic and environmental development. As the inspectorate is established to protect the environment, the environmental protection element of sustainable development should take precedence in inspectorate decisions and activities.

The Flemish Community, Belgium

The Flemish Environmental Inspection Section has for several years defined the mission, vision and values of the organisation and its staff. These have become key elements in the continuous drive to optimise the structure and operation of the service. The cornerstone in this regard is the “raison d’être of the service:

“To check and stimulate the quality of environmental health policy and its implementation, with the objective of improving the quality of the environment.”

The purpose of a mission statement includes:

- To give a clear steer to all staff concerning the vision for regulation.
- To highlight how the regulatory activities are linked to visions and values.
- To allow new staff to be trained in the inspectorate’s way of working.
- To provide a coherent statement of the inspectorate’s regulatory philosophy to external stakeholders.
- To incorporate “best practice” into regulatory activities.

⁸ Scottish Environment Protection Agency (SEPA) 2002: Environmental protection means protection of air, land, water, soil, aesthetics and amenity, as well as human health impacts. Regulatory assessments of impact can include local damage, regional and national impacts, and transregional and global impacts.

- To promote, initiate and develop behaviour with the emphasis on the environment as a whole and human health in particular.

The Scottish Environment Protection Agency (SEPA) has formulated the following Mission Statement for its Operations Directorate, dealing with regulation of polluting installations:

SEPA, Scotland

“Through fair, environmentally sound and legally correct regulation and advice, Operations will translate SEPA policies and objectives into effective and progressive action by others to improve the environment”.

Also sub-national inspectorates can express the mission of their institution in few clear sentences:

Västerås Inspectorate Mission

“Through sampling, inspection, enforcement and planning, the inspectorate shall work to ensure a healthy and good environment for present and future generations”.

2.2 Vision

A vision is an aspiration, an organisation’s view of where it wants to go, what it wants to achieve, and what it wants to be. The vision contains an aim for where the organisation may move to; a goal for how far the organisation must reach; and a commitment for the members of the organisation to work in the direction of the vision. A vision should be seen as desirable, realistic and reliable, otherwise it will not have the motivating effect on staff and stakeholders.

The following extract illustrates the potentials of a vision – from Antoine de Saint-Exupéry: *The Little Prince*, 1943:

*If you want to build a ship
do not drum up people to gather timber,
divide the work or give orders.
Instead, evoke their longing for the vast and endless sea*

The vision of an inspectorate expresses in broad terms the desired future, effect and role of the organisation, integrating the needs of both staff and society. The vision indicates a picture of the environmental quality, the environmental performance of business and installations, and/or the inspectorate for a period of time.

Essential environmental elements of the inspectorate vision are typically given by the political level – or by the superior level in the inspection system. However, as visions may concern not only environmental goals, but also, for example, relations to stakeholders or organisational issues, the inspectorates often have room for improving and detailing the centrally formulated vision. The final vision of the individual inspectorate is normally endorsed at the relevant political and administrative levels.

The manager who wants to be sure that the vision is understood and appreciated involves the staff in the formulation of the vision. A brainstorming, seminar or

workshop does not only raise the chance of having a committed staff, but also provides valuable input to the vision, as the staff have experience, insight, and imagination that can supplement the managers' efforts.

The sub-national inspectorate vision may focus on protection of specific recipients:

Västerås Inspectorate, Sweden

In Västerås, a group of managers and staff members formulated the vision, discussed contents and precise wording of the vision during a workshop with the staff and revised the vision in light of the workshop input.

"The Inspectorate with its knowledge and work shall contribute to a healthy and sustainable development in the region of Västerås. The landscape – and especially lake Mälaren - shall be clean and show big wealth of species in flora and fauna. Matters of importance for surface water and groundwater are particularly important.

The City of Västerås shall become a national showcase within environmental protection, ensuring the citizens a good and healthy environment".

The national vision may be comprehensive and cover external as well as internal issues:

The Environment Agency for England and Wales

The Environment Agency for England and Wales has formulated a comprehensive vision divided into a series of elements (extracts only):

"Our vision for the environment and a sustainable future is: A healthy, rich and diverse environment in England and Wales, for present and future generations.

The fundamental goals we want to help achieve:

- A better quality of life. People will have peace of mind from knowing that they live in a healthier environment, richer in wildlife and natural diversity - an environment that they will care for and can use, appreciate and enjoy.
- (...)

The environmental outcomes for which we are striving:

- Cleaner air for everyone. We will have cleaner and healthier air. The emission of chemical pollutants into the atmosphere will decline greatly and will be below the level at which they can do significant harm.
- Improved and protected inland and coastal waters. Our rivers, lakes and coastal waters will be far cleaner. They will sustain diverse and healthy ecosystems, water sports and recreation such as boating and fishing, and those uses needed by a thriving and healthy community.
- (...)

The changes we will seek:

- A 'greener' business world. Industry and businesses will value the services that come from a rich and diverse natural environment. In the process, they will reap the benefits of sustainable business practices, improve competitiveness and value to shareholders and secure trust in the wider community.
- (...)

The risks and problems we will help manage, prevent and overcome:

- Limiting and adapting to climate change. Drastic cuts will have been made in the emission of 'greenhouse gases' such as carbon dioxide and society as a whole will take account of, and be prepared for, the probable changes to our climate.
- (...)"

Depending on the context, the vision may also serve to illustrate the aspirations of the inspectorate beyond the environmental field:

Latvian State Inspectorate

The Latvian State Inspectorate elaborated the following vision during a two-day workshop with 20 staff members with focus at vision, mission and strategy. The vision embraces not only environmental issues but also statements concerning independence, respect and working conditions.

“It is our vision that in future we will see an effective and efficient, not politicised independent environmental inspection system, highly respected in the society.

State Inspectorate ensures the right of the person to live in a environment of good quality and is capable of eliminating not only the consequences of the environmental impacts but also their causes.

State Inspectorate employs highly skilled personnel with appropriate salaries and state guarantees. Implementing the environmental policy plan they are capable of operative acting in any situation using the most modern equipment”.

2.3 Values

Leadership and management practices build - explicitly or implicitly - upon a set of core principles and values. By elucidating and discussing these values with the staff, the inspectorate can operate on the basis of shared values with much more responsibility delegated to staff members. This will reduce the need for prescriptive rules and enable more flexibility and increase the effectiveness of performance.

What is evidently important is that daily management practice is in accordance with inspectorate values. The staff are likely to notice discrepancies between what managers say and what managers do. Thus, the managerial style plays an essential role for the organisation’s culture (see chapter 8).

The French Department of Risk and Pollution Prevention has elaborated four key federating values with which they identify. A number of factors, for example the increase in environmental concerns, the growing complexity of regulations and the demand for better risk control and public information has initiated clarification and affirmation of the values in the Department.

Department of Risk and Pollution Prevention, France

Four Key Federating Values:

Competence

The technical, methodological and statutory competence of all of the inspectors is indispensable to the fairness and efficiency of the Inspectorate’s actions. The full scope of these competencies cannot be covered individually. They must be covered by the Inspectorate through its organisation, through synergies between functional operational departments, and co-operation between national, regional and departmental services.

Impartiality

Aware of the importance of the issues at stake for society, Inspection acts in complete independence of judgement, in compliance with regulations and ministerial instructions. Inspection recommends necessary actions, whatever the social or economic context, whenever the health or safety of its citizens is at stake or the environment threatened.

Fairness

In the interest of the neighbours of classified installations, the operators and all other interested parties, the Inspectorate takes care to ensure fair treatment of its cases, throughout the whole country, by taking aspects such as current urban planning and the sensitivity of the natural environment into account. This approach can result in stricter standards than provided for by general regulations.

Transparency

Inspection has an obligation for transparency in its actions. It must be able to report and explain them to its citizens in a concrete and understandable manner. Via its national and regional supervisory structures, it publishes results, advances and progress still to be accomplished by the operators, while respecting the confidentiality of manufacturing industry.

The Environment Agency for England and Wales has elaborated five values and a model for the Agency culture based on these values:

VALUES – EA for England and Wales	How these will be evident	
	INSIDE	OUTSIDE
We will focus on environmental outcomes	We take pride in our individual roles within a broader allegiance to the Agency as a whole. Knowledge is shared, not hoarded as a source of power. People are trusted by colleagues to take responsibility for actions and outcomes, so there are fewer project and other groups. We concentrate on measuring outcomes, not activities.	We are committed to good environmental outcomes, and to being accountable for what we achieve. We will encourage statutory and financial frameworks that help us focus on outcomes. We are seen to practise what we preach.
By working in effective partnerships	Employees deal with each other with respect, take the initiative to offer help, respond quickly to requests for information or advice and complete agreed actions on time.	We work in partnerships and openly. We may lead or support, understanding always the perspectives of our partners. We seek opportunities to involve others with relevant skills, knowledge or influence. We will develop new forms of partnership between the regulator and the regulated.
being robust	We have a culture of self-development and support each other with honest and straight-forward feedback. Honest mistakes are learned from, not penalised, but sloppy performance, indifference to customers and negative attitudes are not tolerated.	The Agency is recognised as having practical, authoritative and professional knowledge. We manage and surpass expectations of us through efficient and responsive performance. We are fair but firm regulators, acknowledged for quality and consistency.
and flexible , embracing change, learning and improvement	We value flexibility, a willingness to embrace change, new ideas and challenge to traditional assumptions. We learn from each other and from outside benchmark organisations to promote continuous improvement.	We demonstrate to all with whom we interact helpful and flexible attitudes and a positive approach to new ideas. We recognise that ongoing change is essential to our effectiveness.
To deliver all this we must exert real influence	We recognise the wide variety of people and organisations who can make a difference to the environment. We nurture our many areas of expertise, but communicate in clear language with understanding of the needs of those whom we seek to influence. We target our communications to achieve maximum impact.	Agency employees promote the Agency's standing and reputation with customers and stakeholders. We achieve real influence because our knowledge and opinions are simply and helpfully communicated and well targeted.
	<i>To work here brings a great sense of achievement and enjoyment.</i>	<i>Champions of the environment, within the context of economic growth and social progress.</i>

The process of formulating values (and vision) may benefit from being carried out away from daily work:

Västerås Inspectorate, Sweden
 Västerås Inspectorate discussed visions and strategy during a four days workshop in a rented cottage with participation of all staff members. The four days alternated between presentations, plenary discussions and group work. Among the topics were:

Mutual basic view

- Do we live up to the visions and the mission statement?
- How do we make the vision and the mission statement pervade the daily work – and why is this important?
- Do we need to change?
- How do we achieve a working climate where everyone contributes to approach the vision

The administrative point of view

- What is a policy? And a guideline?
- Do we really need such?
- Advantages of policies and guidelines.
- Which policies and guidelines do we need (group-work)
- How do we create job satisfaction (empowerment, encouragement, delegation, adequate resources, mutual social activities)

Goals and methods

- Should we give high priority to preventive work or to practical inspection work?
- Should we participate in projects in the periphery of our mission?
- Should we work with international environmental issues?
- Is it possible to assess the environmental benefits of different efforts – compared to resource consumption?
- What could be changed in the daily work?
- How does management handle prioritisation of efforts?

The correlation between vision and values/principles are illustrated with The Scottish Environment Protection Agency’s principles for regulation in figure 2.

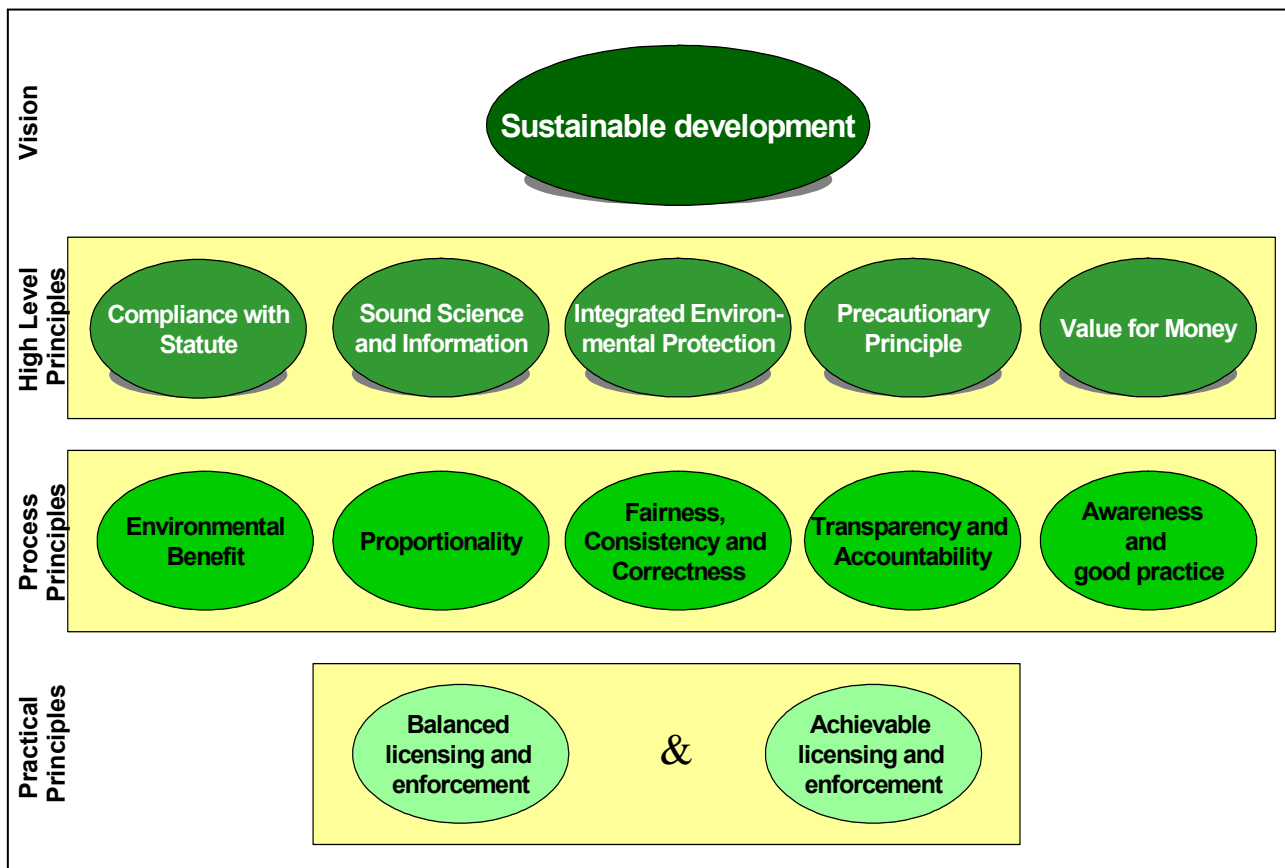


Figure 2 - Scottish Principles for Regulation. The main principle is the drive for sustainability; some of the 12 underlying principles are explained later in this section.

Some major principles are described below:

The Precautionary Principle can be defined as a key plank of environmental policy: Where there are significant risks of damage to the environment the inspectorate should be prepared to take precautionary action to limit the use of potentially dangerous materials or the spread of potentially dangerous pollutants. This even extends to where scientific knowledge is not conclusive, if the likely balance of costs and benefits justifies it⁹.

Integrated Environmental Protection seeks to ensure that protection and improvement is sought across the range of environmental media – air, land, water, soils rather than media by media. It also seeks to ensure that permit conditions, inspections, enforcement and environmental monitoring are linked together.

The principle of **Proportionality** means that actions should be **targeted** (for example permitting, compliance activities and enforcement) in proportion to the risk or damage involved. However there will be cases where the risk of environmental damage is low but a history of poor operator environmental performance and attitude may require a higher level of action.

The inspectorate should undertake its duties with **Fairness, Consistency and Legal Correctness**. There is a need for the inspectorate to be consistent in its application of the law and in enforcement activities. This does not mean the same as being uniform, as it must allow for variations in circumstance, polluting installations, local environmental conditions etc.

To be a **transparent organisation** means that an interested party can establish the purpose of the organisation, its aims, processes, means of delivery etc with relative ease. The inspectorate must seek to explain to its stakeholders, customers and service users its range of powers and how it goes about its business.

The Flemish Community, Belgium

To guide the staff in their approach, the following values have been defined by the Environment Inspection Section (EIS). EIS wants staff who are loyal, enterprising and contended people who:

- provide customers with support and explain clearly what they do;
- are available and approachable;
- respond quickly, dynamically and realistically to challenges;
- co-operate in an integrated manner to get results;
- always stay one step ahead thanks to their vision, creativity and expertise;
- always seek to improve their work and enjoy what they do;
- maintain healthy ecological reflexes;
- display a correct enforcement respond.

The values of the inspectorate are reflected in approaches to its activities and in written policies, guiding the staff's handling of specific matters. It is important to consider the practical effects of a policy to ensure the most cost effective use of inspectorate resources. Tools for this purpose are included in chapters for Leadership and Management and Strategy.

⁹ Derived from the Environment Agency of England and Wales.

Västerås, Sweden

Västerås Inspectorate has formulated an environmental policy for the internal operation:

“The Inspectorate shall protect human health and the environment. Through our daily work and the following guidelines we contribute to a sustainable development.

The Inspectorate internally and during inspection shall:

- Follow and adapt to legislation, stipulations and other rules that are relevant to our organisation.
- Utilise renewable resources as far as possible.
- Reduce waste generation through a life cycle approach, promoting reuse and recycling of paper and products
- Continuously pursue resource savings and energy savings.
- Prevent actions that could influence negatively on the environment.
- Involve all staff in the environmental work.
- Contribute actively to awareness and understanding of environmental issues.

Enforcement policies are typically prepared at the highest national level of environmental inspection. The Scottish Environment Protection Agency’s enforcement policy in the following box reflects the values illustrated in figure 2.

SEPA, Scotland

The aims of the Enforcement Policy from Scottish Environment Protection Agency are among others:

- to ensure compliance with environmental licences
- to ensure that a consistent approach to enforcement is adopted throughout SEPA
- to achieve an even handed treatment of offenders

The purpose of enforcement is defined as to ensure that preventative or remedial steps are taken to protect the environment, or to secure compliance with the regulatory systems.

Important policy statements are:

- SEPA will not ignore any knowingly criminal or negligent act by any person which damages or threatens the environment or which ignores the law
- Persistent breach of licence conditions will not be tolerated. If, due to the nature of the breach, these are of no consequence, the license should be amended rather than allow breaches to persist.
- Whatever the timescale and urgency of enforcement action, it will be fair, reasonable and open and recorded in the public register.
- If a final warning is given it must be that. Failure to conform with a final warning must be followed by action.
- The purpose of action is to prevent, mitigate or remedy harm to the environment, therefore action should be taken without any undue delay once the full facts are known.

2.4 Review of mission, vision and values

A regular discussion and review of mission, vision and values is useful in several aspects:

- It promotes mutual understanding of the statements;
- It secures that the statements correspond to the prevailing political, legal and practical conditions;
- It improves correlation between written and practised values.

A SWOT analysis (see section 3.1) may illustrate to which degree daily performance targets the vision and corresponds to written values. This may also be achieved by open discussion in working groups or with selected staff, see also section 7 about inspectorate culture.

2.5 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing mission, vision and values.

- Does the inspectorate have a shared and understood high level Mission Statement that expresses the reason for the existence of the inspectorate and its role in international, national and regional contexts?
- Does the inspectorate have a shared and understood vision, which sets out high level aspirations for what the organisation wants to achieve (within the limits of the mission)?
- Are the mission, vision and values meaningful, relevant and realistic?
- Does the inspectorate routinely revise the mission statement and vision to reflect changing situations and priorities?
- Does the staff operate on the basis of defined and shared values?
- Have staff members been involved in preparing mission, vision and values; or have mission, vision and values been discussed with the staff?
- Does management in daily practice express the values and core principles of the inspectorate?
- Does the Inspectorate have the possibility to work independent and without undue external influence?
- Have those that the inspectorate regulates, other stakeholders and the public been involved in the formulation of the mission statement, vision and values?
- Are the mission, vision and values and the outcome of the work communicated to those that the inspectorate regulates, other stakeholders and the public – and is the inspectorate accountable for it?
- Does the inspectorate monitor its progress towards achieving its vision?

3 Strategy and Planning

Strategy refers to the way in which objectives are to be reached. It can be defined as the long-term plan of action of an organisation to realise its objectives within the available means.

A strategy in its most simple expression can be seen as a framework management plan, involving four steps:

1. *Where are we now?* - State of affairs (including assessment of statutory obligations).
2. *Where do we want to go?* - Definition of goals (based on the vision).
3. *How do we get there?* - Formulation of targets and objectives.
4. *Are we succeeding?* - Monitoring and review.

Preparation of a strategy serves many essential functions in the inspectorate:

- It helps management to clarify and focus the inspectorate's activities in light of vision and mission. Strategy provides input for prioritising resources for the most important duties. Without a strategy, resources are often used on the most urgent (in contrast to important) matters – not leading to effective performance.
- It illustrates the inspectorate's objectives and success criteria for both management and staff.
- It offers a benchmark against which inspectorate performance can be measured and reviewed.
- It serves as a basis for discussion with third parties, for example local business communities or politicians and the general public.

Over time, strategies develop by virtue of input or opinions from staff, managers, politicians and stakeholders. Objectives are updated, reformulated or changed, and the way in which the objectives will be achieved is revised.

SEPA, Scotland

The Scottish Ministers have approved the following *overall aim* for Scottish Environment Protection Agency, SEPA (from SEPA Management Statement, Scottish Executive Paper 2002/19, July 2002).

To provide an efficient and integrated environmental protection system for Scotland which will both improve the environment and contribute to the Scottish Ministers' goal of sustainable development.

The Ministers have approved the following strategic *objectives* for SEPA:

- To adopt an integrated approach to environmental protection and enhancement which considers impacts on all environmental media and on natural resources
- To work with all sectors of society to deliver environmental requirements and goals, without imposing excessive costs (in relation to benefits gained) on regulated organisations and society as a whole;
- To adopt clear and effective procedures for serving its customers, including developing single points of contact through which they can deal with SEPA;
- To operate to high professional standards, based on sound science, information and analysis of the environment and of processes which affect it;
- To organise its activities in ways which reflect good environmental and management practice and provide value for money for taxpayers and those who pay its charges;
- To provide clear and readily available advice and information on its work, and to involve the public in environmental protection; and
- To develop a close and responsive relationship with the public, local authorities and regulated organisations.

An evaluation of the present situation leads to formulation of goals (often derived from the vision) and the subsequent development of operational objectives and action plans. It is important to assess progress towards achieving goals and objectives through use of indicators and periodic review. These reviews should also consider whether key assumptions have changed and objectives and action plans need to be revised.

Österåker, Sweden

In Österåker, the most important environmental issue (due to fragile recipients) is wastewater discharges. Accordingly, the strategy objectives relate to wastewater and indicators focus on number/percentage of polluting installations connected to the wastewater treatment plant and the purification quality of the plant.

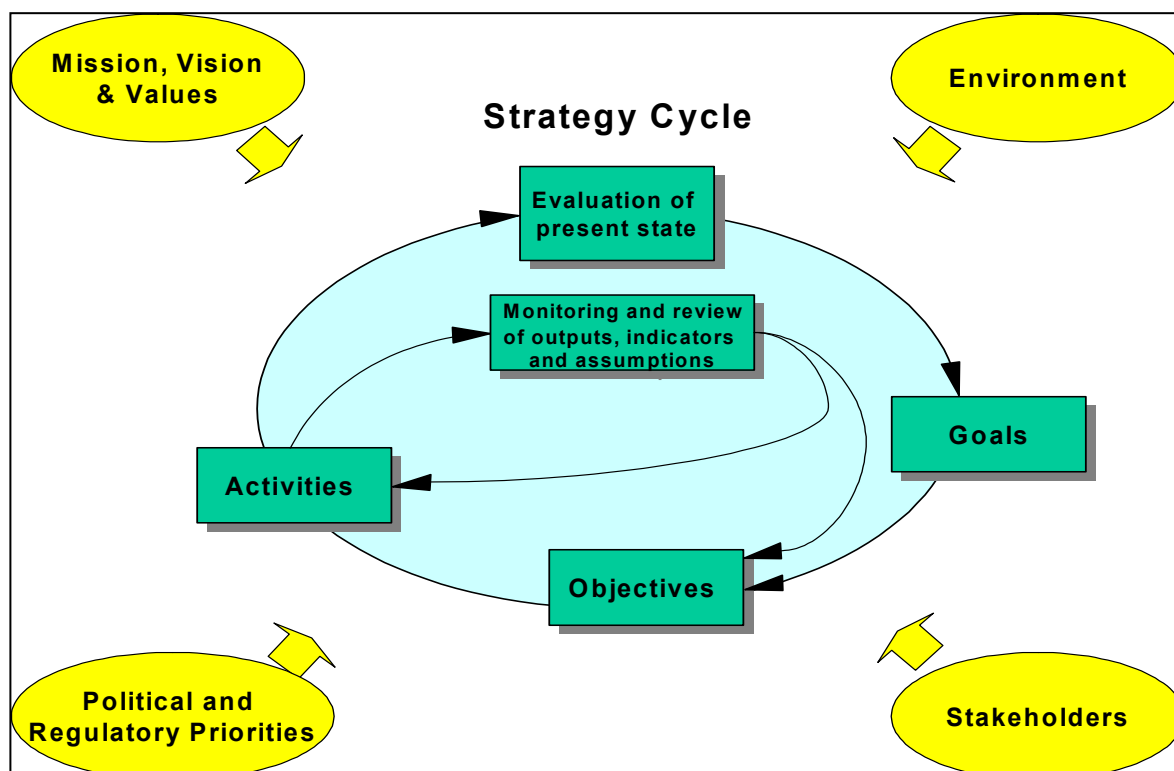


Figure 3 - The Strategy Cycle: Evaluation of the present state embraces consideration of environmental situation, mission statement, and viewpoints of politicians and stakeholders. Goals are concretised with objectives and actions. The effective implementation of the strategy is assessed against indicators, that – together with control of assumptions – may lead to revised objectives and actions. The cycle is repeated with an interval of some years.

3.1 Evaluation of present state

The Inspectorate establishes a basis for the strategy by assessing environmental conditions and compliance, reviewing legislation and political priorities, analysing stakeholder interests, and analysing the inspectorate’s strengths, weaknesses, opportunities and potential threats to it.

3.1.1 Legislation and political priorities

Some central questions concerning the international, national, and sub-national political priorities and legislation need to be considered while identifying inspectorate priorities:

1. Are the driving forces and requirements clear?
2. Are there any conflicts between them?
3. What flexibility is there?
4. What are the priorities of this organisation?

3.1.2 Stakeholder analysis

Knowledge of the stakeholders' opinions and views on the inspectorate and the environmental situation etc. can be valuable in planning and adjusting the strategy.

The stakeholder analysis may contain elements such as:

1. Identification
 - Identify stakeholders
 - Categorise stakeholders
 - Discuss interests
2. Selective analysis
 - Analysis of stakeholders' interests and views
3. Set priorities
 - List identified needs
 - Survey potential conflicts
 - Decide on measures to avoid conflicts where needed

To set priorities when resources are limited, the outcome of the stakeholder analysis can be regarded in two steps:

Stakeholders Influenced by Inspectorate Decision and Efforts

<i>Influenced by decisions and efforts</i>		
Character of Influence	Little	Much
Positive	Information	Active involvement as advocate
Negative	Involvement according to need	<i>Focus attention</i>

- Attention should be directed towards stakeholders that are negatively influenced by inspectorate activities. Involvement should be considered.
- Those that are positively influenced can be used as advocates for the inspectorate work.

Stakeholders with Influence on Inspectorate Success

Attitude/interest	Influence on success	
	Little	Large
Positive	Involvement according to need	Active involvement as advocate
Negative	Keep informed	Focus attention

- Special attention should be directed towards stakeholders that have large influence on success but a negative attitude to the planned changes. Consider involvement of those who are against and have most to lose.
- Those that have little influence and negative attitude/interest should be properly informed about the strategy and its consequences.
- Those that have big influence and a positive attitude should be involved actively and be used advocates for the changes.
- Those with little influence and a positive attitude should be informed about the strategy and its consequences and if possible involved in solutions.

The figure beneath illustrates how a sub-national inspectorate sees its surroundings.

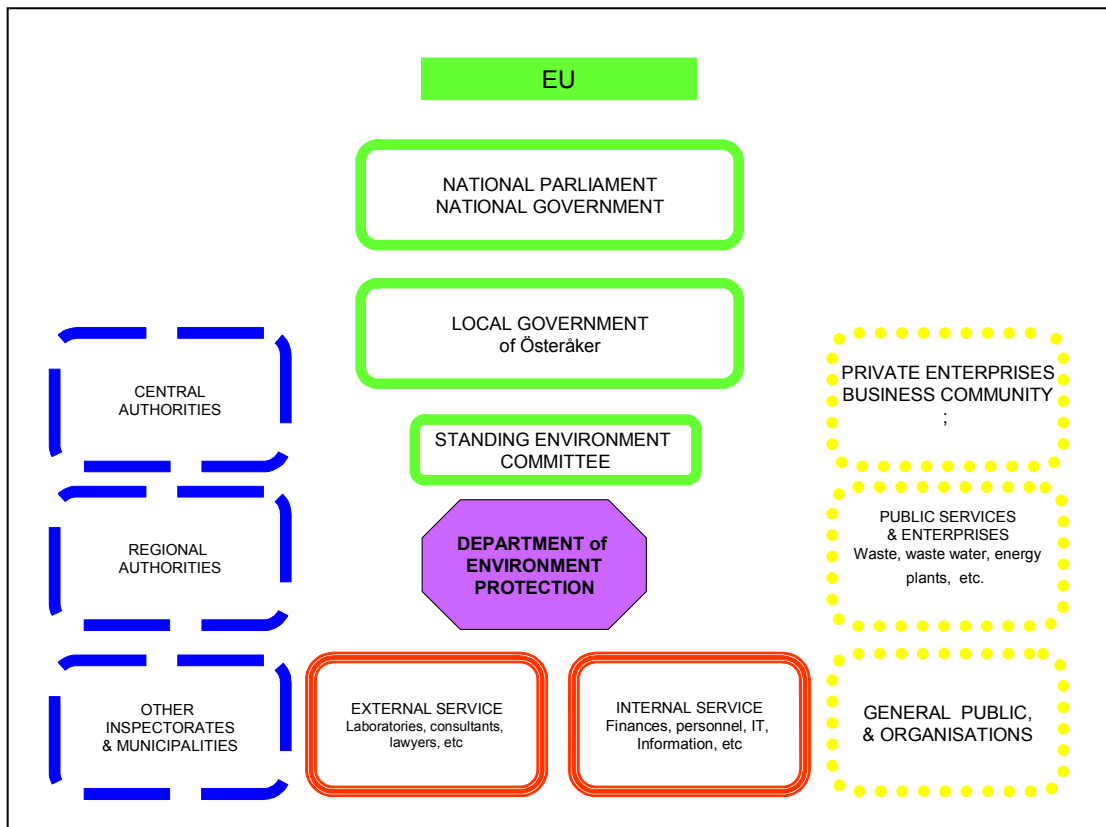


Figure 4 - Actors in the environmental surroundings of Österåker Inspectorate, Sweden. The boxes on top indicate the different levels that more or less give the framework for the inspectorate work in the form of legislation, resources, and political priorities. The boxes to the right indicate the different categories of stakeholders that the inspectorate supervises. The boxes in the middle are services that the inspectorate has to purchase. The boxes to the left are authorities to co-operate with.

It is quite useful to assess the relationship of the inspectorate to other stakeholders and use that information when addressing different targets or topics. When communicating with each of the different types of stakeholders, the Department has to apply different strategies, tools and aims.

3.1.3 Stakeholder opinions

If the inspectorate has a more specific need for knowledge on stakeholder opinions the inspectorate can carry out a stakeholder opinion poll:

Høje Taastrup, Denmark

Høje Taastrup Inspectorate engaged an opinion poll institute to carry out a survey of the customer satisfaction with the services and initiatives of the inspectorate. Among the questions asked to 60 anonymous enterprises were:

- are you satisfied with the inspection work of the inspectorate?
- what has been positive in your contact with the inspectorate?
- what has been negative in your contact with the inspectorate?
- are you satisfied with the time for case handling in the inspectorate?
- is it easy or difficult to communicate with the inspector?
- are you satisfied with the inspectors' professional skills?

The poll has led to modifications of inspection procedures.

3.1.4 Assessing the conditions of the environment

An assessment of the state of the environment within the jurisdiction of the inspectorate is fundamental to inform the setting and prioritisation of goals, targets, objectives and strategies. This could be achieved by gathering information or conducting a survey embracing:

- Air quality.
- Groundwater quality and resources.
- Surface water quality and resources.
- Waste problems.
- Land Quality.
- Noise.
- Health aspects.
- Ecological Quality.

To assess the pollution level, the inspectorate should monitor compliance with international and national priorities, standards, agreements etc.

By repeating the survey within decided intervals the inspectorate will be able to detect trends and establish a basis for the goal setting and enable continuous assessment of the development.

3.1.5 Overview of polluting installations

By creating an overview of the polluting installations' environmental impact the inspectorate can establish an important tool for prioritising inspection resources. The assessment can involve five steps:

- Prepare inventory of polluting installations in the region.
- Division of enterprises/installations into categories (technical groups, scale of operation etc.).
- Assessment of installations' pollution load and environmental performance (including nuisances as noi), compliance, and risk.
- Assessment of installations' attitude and the possibilities for co-operation.
- Gauging the public opinion to industrial pollution and to the risk posed by different types of installation.

Environmental priorities change over time. The assessment of industrial pollution and risks should therefore be repeated with intervals laid down in connection with decisions concerning the strategic cycle.

Parameters in the assessment are often:

- Wastewater.
- Air emissions and odour.
- Waste generation and management.
- Use of dangerous substances.
- Noise, light and other nuisances
- Resource efficiency.
- Soil contamination.
- Compliance with regulatory requirements.
- Light pollution.
- External safety.

An assessment of citizens' experience of inconveniences from noise, air pollution etc. should be included. Valuable information could also be received from trade unions, staff etc. when available.

A detailed approach to assessment of polluting installations is provided in section 8.1.2, Operator and Pollution Risk Appraisal System.

3.1.6 Analysing the Inspectorate - SWOT

The SWOT analysis (Strengths – Weaknesses – Opportunities – Threats) scrutinises the internal state of the inspectorate, focusing on strengths to utilise as means for strategy implementation; weaknesses that should be addressed; opportunities that illustrate the future path of the inspectorate; and threats that demand attention in order to avoid negative impact on the inspectorate.

Involvement of both managers and staff – and if possible external stakeholders - in an open discussion of the SWOT elements leads to increased ownership and commitment, while clarification of the SWOT elements supports the preparation of a progressive strategy with focus on strengths and opportunities.

Internal analysis

Typical issues of strengths and weaknesses are: Values, know-how, skills, resources, efficiency, customer and stakeholder satisfaction, political interest and support, work load, spirit, information, technology, corporate identity, etc.

Strengths	Weaknesses
<ul style="list-style-type: none">• What are the advantages of the inspectorate?• What does the organisation do well?• What do other people see as the strengths of the inspectorate?	<p>Discussion of weaknesses is the most difficult part of the SWOT-analysis as these may, as an example, indicate imperfect management or staff performance. It is very important at this stage to look forward, appreciate the challenges and not focus at personal issues.</p> <ul style="list-style-type: none">• What could be improved?• What should be avoided?

External analysis

Typical issues of opportunities and threats are: Changes in government policy, new legislation, networks (being established or disappearing), financial condition for the inspectorate, reputation, interest and attitudes in the industry or in the general public.

Opportunities	Threats
<ul style="list-style-type: none">• Which opportunities are opening new ways for the organisation?• What interesting trends are you aware of?	<ul style="list-style-type: none">• What obstacles does the organisation face?• Could changing political priorities give rise to modification of the inspectorate's tasks?• How is the future financial situation?

How to use SWOT

The SWOT analysis leads to clarification both in terms of pointing out what needs to be done, and in putting problems into perspective. By carrying out a SWOT analysis the inspectorate can focus on central questions: What is our strategy, what do the politicians want, how can we improve our services?

Both managers and (selected) staff should be involved in the process – together or separately. This will typically bring forward a series of issues amending the individual manager's perception of the situation. The analysis may be carried out during a strategic workshop that can last one or two days and embrace all staff together or in different sessions.

1. Brainstorming on the strengths of the inspectorate
2. Brainstorming on weaknesses
3. Discussion of strengths and weaknesses
4. Brainstorming on external opportunities
5. Brainstorming on external threats
6. Discussion of opportunities and threats, which are most important and likely
7. Strategic discussion:
 - How can specific strengths be used to achieve objectives and deliver maximum benefits?
 - How can weaknesses be repaired or neutralised?
 - How can threats be avoided?
 - What does the SWOT picture mean for the strategy?

Example on SWOT from a national inspectorate (NI) with sub-national units (SNU)	
Strengths	Weaknesses
<ul style="list-style-type: none"> • Legislation sets out an important role of NI as supervisor of SBU • NI has some influence on SBU • NI staff are well educated, enthusiastic and responsible • Management is open minded for development and changes • The structure of NI is clear and sensible 	<ul style="list-style-type: none"> • Strategy and development perspectives are missing • Lack of co-operation and communication between divisions • No uniform procedures for inspection have been elaborated • The horizontal and unclear division of tasks and responsibilities (structure) between NI and SBUs is ineffective • Lack of monitoring system minimises possibility of improving performance of SBUs
Opportunities	Threats
<ul style="list-style-type: none"> • Increased support from politicians and state budget due to EU accession • Co-operation with public and awareness raising • Intensified international co-operation may support development • Increasing public awareness on industry's environmental impact 	<ul style="list-style-type: none"> • Opposition from the relatively autonomous SBUs may hamper a uniform inspection approach • The Ministry has not indicated a clear position concerning the future structure • Low salaries make it difficult to attract and maintain skilled staff

Example on SWOT from sub-national unit (SBU)	
Strengths	Weaknesses
<ul style="list-style-type: none"> • Professional knowledge • Visibility in the region • Respect for the work • Independent and inter-dependent staff • Good social environment at the work-place • Occupational groups with possibility for specialisation and exchange of high level knowledge 	<ul style="list-style-type: none"> • Lack of expertise on specific industrial sectors • Unclear internal organisation • We do not follow up on new possibilities • Other authorities feel threatened by us • Weak internal communication
Opportunities	Threats
<ul style="list-style-type: none"> • Increased understanding in enterprises as market demands rise • Prevention of pollution will be a place where enterprise and inspectorate interests meet • The minister seems to stake on local inspectorates and not regional • Increased environmental demands to larger farms increase need for inspectors 	<ul style="list-style-type: none"> • Some politicians want to centralise inspection • Enterprises are not satisfied with the work /service from the inspectorate • If the preventive approach is not pursued inspection work will lose attraction force on skilled labour • Lack of in-service training hampers proper handling of new tasks

The SWOT analysis can be a very effective tool in searching for improvements of inspectorate performance.

The Industrial Inspection Agency Hanover has inspection, permitting and enforcement competencies in the fields of environmental protection, occupational health and safety and consumer protection.

The inspectorate decided during a two-day workshop in autumn 2000:

- that quality management should be a permanent task,
- that the basis for the quality management should be EFQM-model (European Foundation for Quality Management Excellence Model) ,
- that self evaluation should be made according to the workshop method, and
- that on the basis of the self-evaluation the employees will be to asked to suggest priorities for actions.

For each of the individual management elements a working group of 2-4 employees was set up to analyse strengths and weaknesses of the inspectorate, subsequent to which the findings of the working groups were discussed and co-ordinated at a plenary meeting. The results of the self-evaluation were summarised as:

Strengths	Areas for Improvement
<ul style="list-style-type: none"> ▪ Competent employees, ▪ Reliable and rapid services, ▪ Further education, training and employee promotion, ▪ Good image to the customers, ▪ Improvement processes are initiated ▪ Leadership principles are described ▪ Customer needs are identified and evaluated. 	<ul style="list-style-type: none"> ▪ Identification, description and improvement of key processes, ▪ Definition of performance and process indicators, ▪ Improvement of information and knowledge management, ▪ Development of an employee and process-orientated EDP system, ▪ Topicality of the available tools and information.

Following the vote of the employees, the inspectorate concentrated its quality work in 2001/2002 on, among others, the improvement of the information and knowledge management

The internal analysis leads to a series of proposals for the development of the Inspectorate. The decision on what to prioritise and what to give a lower priority is taken as part of strategic discussions concerning goals and actions (refer to next section). As illustrated in the Irish example below the outcome of the SWOT analysis may lead to promising organisational improvements.

The Irish Environmental Protection Agency		
The Irish EPA has prepared a Change Plan summarising the change agenda for a series of topics. The Change Plan embraces the following main elements (with a few (of more than 100) proposals for initiatives):		
Today We are ... 2002	Change Agenda	Tomorrow We Will Be ... 2005
EPA Role		
<ul style="list-style-type: none"> • Independent body with good regulatory systems in place 	<ul style="list-style-type: none"> • Release high level resources for the strategic agenda 	<ul style="list-style-type: none"> • Credible and independent body enjoying trust and credibility with stakeholders
<ul style="list-style-type: none"> • Somewhat invisible and bureaucratic 	<ul style="list-style-type: none"> • Become more efficient and effective at core work to release resources to the strategic unit 	<ul style="list-style-type: none"> • Effective regulatory body. Key player in national policy making.
Building Superb Organisational Capability		
<ul style="list-style-type: none"> ▪ Credibility is an issue with some stakeholders 	<ul style="list-style-type: none"> ▪ Clarify exactly what we can deliver and state it clearly ▪ Review the need for ISO quality systems ▪ Be consistent in licensing and enforcement 	<ul style="list-style-type: none"> ▪ Credible with all stakeholders.
Delivering high quality services to our stakeholders		
<ul style="list-style-type: none"> • Recognised as good licensing system by licensees 	<ul style="list-style-type: none"> • Prioritise and concentrate enforcement effort on high environmental risks 	<ul style="list-style-type: none"> • Provide efficient and effective licensing system balancing environmental protection with economic development, and providing certainty and consistency in decision making
<ul style="list-style-type: none"> ▪ Enforcement credibility low ▪ Transparency of decision making questioned 	<ul style="list-style-type: none"> ▪ Assign one Director with overall responsibility to liaise with NGOs. 	<ul style="list-style-type: none"> ▪ Provide high quality accessible information ▪ Transparent decisions that are coherent, understandable and accessible

		<ul style="list-style-type: none"> Provide for participation and involvement
Monitoring and continually improving what we do		
<ul style="list-style-type: none"> Work programme in place 	<ul style="list-style-type: none"> Consider changing structure of work programme and how it is reviewed at six monthly intervals to allow better assessment of progress on priority areas 	<ul style="list-style-type: none"> Periodic strategic review Regular operations review Feedback to modify where necessary

On the other hand the SWOT analysis may also more directly target improvements of inspectorate services:

SEPA, Scotland			
The Scottish Environment Protection Agency has developed a number of measures assessing the quality of its regulation of licenses:			
	Performance against targets		
	1997/1998	1998/1999	1999/2000
Water quality targets Improve the level of consent compliance for sewage and industrial discharges to 90 per cent by 2001/2002 (target was 80% consent compliance up to 1999/2000)	<ul style="list-style-type: none"> No. of samples 1,774 No. of complying 1,415 80 per cent 	<ul style="list-style-type: none"> No. of samples 1,742 No. of complying 1,427 82 per cent 	<ul style="list-style-type: none"> No. of samples 1,779 No. of complying 1,452 82 per cent
Explanation for target: The target measures the proportion of samples of sewage and industrial sewage which meet conditions laid down in water consents			
Waste management targets Ensure that 80 per cent or more of waste management sites demonstrate satisfactory operator performance	<ul style="list-style-type: none"> Operator performance scheme not in place 	<ul style="list-style-type: none"> 67 per cent satisfactory operator performance 	<ul style="list-style-type: none"> 80 per cent satisfactory operator performance
Explanation for target: SEPA has developed a scoring system to assess operator performance using a range of criteria based on standard conditions laid out in waste management site licenses. The target measures the proportion of sites which achieve or exceed a certain number of points using the scoring system.			
Integrated pollution control targets Ensure that 80 per cent of IPC sites demonstrate satisfactory operator performance	<ul style="list-style-type: none"> Operator performance scheme not in place 	<ul style="list-style-type: none"> No. assessments 110 No. satisfactory 99 90 per cent 	<ul style="list-style-type: none"> No. assessments 128 No. satisfactory 112 88 per cent
Explanation for target: SEPA has developed a scoring system to assess operator performance using a range of criteria based on standard conditions laid out in IPC site licenses. The target measures the proportion of sites which achieve or exceed a certain number of points using the scoring system.			

3.2 Goals

Having created a qualified overview of the present situation, time has come to formulate or revise the strategy, built by a hierarchy of elements.

The vision should be aspirational and long-term. Underlying goals should provide more detail about the environmental targets the inspectorate wishes to accomplish and set the medium-range direction. Goals can often be derived directly from the vision and the desired environmental outcome¹⁰. The strategy is made operational with objectives, outputs¹¹; activities that do not lead to outputs are omitted.

"If you don't know where you are going, you'll probably end up somewhere else." **Lewis Carroll**

¹⁰ Environmental outcome is the thematic and long-term focus to which the inspectorate direct its efforts and against which the effect of performance of these efforts is measured in terms of impact.

Goals can be seen as a window to the external world that the inspectorate is trying to influence and should aim at presenting the situation that occurs if the strategy is successfully accomplished. The proof of strategy success is whether things are getting better, or at least being affected positively, in the real world.

Hessen, Germany

The inspectorates of Water Protection in Hessen observe a number of enterprises, divided into three priorities depending on their water-pollution-risk (defined by the risk of the plants and the location of the enterprise). Based on this priority system the inspectorates plan their inspections. Based on six criteria the inspector decides if the enterprise complies with the regulations:

- the inspector has carried out an inspection
- the necessary licences have been received
- the necessary work of redevelopment of plants and waste water systems are coordinated with the inspectorate
- the statutory inspection of external experts are carried out and the report has been received, contamination of the soil and the underground water are examined and
- eventual necessary remediation are coordinated with the inspectorates and started.

The target of the ministry is that all enterprises comply with the law of water-protection before end of 2009. The numbers (in percent) are presented every year in the budget of the ministry.

Beside the forcing of inspections by administration, the ministry follows the strategy to teach the manager (of the enterprises) in comprehension of the regulations and to work together with associations of industry and assurances.

Goals are pursued via more specific, action-oriented objectives that are reached through actions and deliverables. The objectives serve as more tangible measures for inspectorate performance. It is helpful to think of goals as independent of how the organisation will achieve them. This frees the organisation to explore alternative approaches to delivering products and services.

An environmental goal could be: *All rivers in the region complies with the limit values for heavy metals.*

A connected objective for inspectorate performance could be: *All electroplating enterprises in the region comply with emission limit values for heavy metals before end of 2002.*

Dealing with outcome-oriented goals (that concern the environmental situation) should not be mixed with formulating mission-oriented objectives (that concern operation of the inspectorate). The latter are certainly important to the long-term success of the organisation, but they are at a different level than the things the public wants the inspectorate to accomplish. It may be helpful to address these management issues separately.

The sophistication of the goal setting process will grow with experience, budgets and personnel - from rough methods to more elaborated ones.

Priorities should be agreed internally within the inspectorate and with partners/other relevant authorities at the national and sub-national levels. Once priorities have been established and endorsed at the proper political/administrative level, they will need to be communicated to all inspectorate personnel.

Even if you do not have baseline data this should not stop you from setting goals and target levels in the beginning of the strategy process. Target levels based on professional judgement and the precautionary principle (see section 2.3) can offer

¹¹ Outputs in this context means “direct results of project activities”, not to be confused with Outcome, the effect of projects or strategies.

a workable, interim solution to get started. Involvement of senior managers is critical in formulating programme goals, but also other selected staff may contribute to this process. The pursued outcome of a national strategy may be broad.

SEPA, Scotland

The Scottish Environment Protection Agency's (SEPA) 2003/04 Corporate Plan targets directly address the policy priorities of the Scottish Executive. The Management Statement prescribes the annual setting of these priorities by the Executive to guide SEPA's annual work programme. SEPA has adopted a deliverables approach to provide a SEPA-wide programme of activities that address the annual corporate targets. Also, the deliverables align with, and contribute to achievement of SEPA's seven environmental outcomes:

- Providing an excellent environmental service for the people of Scotland: regulation and the environment
- Improving sustainable use of natural resources (...)
- Maintaining and restoring all water environments
- Ensuring good air quality
- Ensuring land is protected, maintained and restored
- Promoting respect for the environment in Scotland
- Creating the environmental framework for the economic wellbeing of Scotland

An example showing how directorate deliverables align with these targets is shown below for the first outcome in the box above: Providing an excellent environmental service for the people of Scotland – regulation and the environment.

Corporate Plan Targets 2003/04 (Selected)	Activities addressing target contained in SEPA Deliverables 2003/04:
Compliance	
No member of the public receives radiation above dose limits	Radioactive Substances –monitoring and control
Licence compliance with Control of Pollution Act 95%	Minimisation and control of Water pollution
Satisfactory operator performance for Waste Management Licences 90%	Control and Management of Waste
Satisfactory operator performance for Integrated Pollution Control 92%	Minimisation and Control of air pollution
Satisfactory operator performance for Air Pollution Control 92%	Minimisation and Control of air pollution

In turn, activities within each deliverable are described with SMART success measures (see section 3.3). An example for Operations Directorate (the directorate charged with regulatory responsibilities) follows

Minimisation and control of Water pollution	
Protect and improve the water environment and achieve quality objectives through targeted action to identify and remedy problems as well as effective policing in relation to activities and incidents which may damage the water environment. This should be achieved through appropriate regulatory action and proactive engagement with stakeholders, including:	
<ul style="list-style-type: none"> • The issuing and monitoring of consents and authorisation to discharge • The issuing of advice and warnings to those involved in activities which may give rise to pollution, or where licence holders are in breach of their licence conditions with enforcement action being undertaken as necessary and appropriate. • The design and implementation of environmental improvement programmes and action plans. • Liaison with industry, general public and other public sector agencies 	
Output examples	Success Measure examples
Output a: Improved Water Quality Achieve measurable improvements in the water environment	River quality classification improved (from C & D) by 50 kms by 31/03/04 Coastal waters quality classification improved by 21 kms by 31/03/04
Output b: COPA consent compliance Measurement of quality of discharges in respect of consent standards (...) (...)	95% of monitored discharges demonstrate satisfactory performance by 31/3/04 (...) (...)

3.3 Objectives

For each of the strategic goals a number of medium to long term objectives with deliverables and actions should be specifically designed. Whereas it is typically beneficial and expedient to discuss goals and objectives in plenum, specific action plans are often prepared in sub-groups – if convenient based on mutual brainstorming.

The objectives should be precise and clarified with indicators, expressing the desired situation that should be achieved. As far as possible, objectives should be formulated to be SMART:

S – Specific	Descriptive or quality statement, clear about what, where, when, and how the situation will be changed
M – Measurable	Able to quantify or otherwise made tangible, data should be available
A – Accurate	Including measures such as quantity, location etc.
R – Realistic	Able to obtain the level of change reflected in the objective
T – Timely	Including a time-bound measure, stating the time period within which the objectives will be achieved

Unclear objectives and targets lead to unclear performance and wrong prioritisation. Careful formulation of objectives and targets is a prerequisite for successfully carrying out a strategy – and for obtaining the benefits of mutual understanding of the rationale behind the performance and development of the inspectorate.

Strategies may contain both long term and short term objectives:

Copenhagen County Vision: A safe and sound environment in the region		
Objectives – Long Term		Indicators
1	The enterprises within the jurisdiction of the inspectorate prevent pollution in the region according to national and international standards	Within three years inspection reports demonstrate that enterprises prevent pollution of groundwater and soil. Landfilling of industrial waste should be reduced by at least 10% during the same period.
2	The inspectorate solves its authority tasks and duties efficiently (time, quality and productivity)	The department in two years has implemented quality assurance for all authority tasks.
3	The inspectorate takes part in environmental development projects with enterprises and research institutions	Project proposals have been elaborated.
Objectives – Short Term		Indicators
1	In close co-operation with local authorities and enterprises an inventory of the major environmental conditions at large enterprises in the region will be drawn up. The inventory should be combined with a survey of mitigating measures, preferably cleaner technologies.	A regional environmental network has been established with enterprises and authorities. The network will exchange information and knowledge on environmental impacts. Another but similar network has been established between authorities, waste management companies and enterprises, aiming (among others) at an inventory of amounts and final destination of industrial waste.

3.4 Inspectorate Plans and Action Plans

Development of different plans will clarify the long term and short term intentions of the inspectorate.

3.4.1 Overall planning

By developing and maintaining an Inspectorate Overall Plan (also called Business Plan or Corporate Plan), compiling selected papers described in this book, the managers will have a very useful document at their disposal. The Inspectorate Business Plan provides the overall picture of the organisation and the management approach, enabling staff and stakeholders to provide input for continuous improvements.

SEPA, Scotland

The Scottish Environment Protection Agency deals with a corporate plan at the national administrative level and business plans at the subordinated levels. At the national level, the plan will set out:

- SEPA's key objectives and associated key performance targets for the following year;
- indicative targets for a further two years and long term objectives up to year 5;
- its strategy for achieving these targets and objectives
- a review of SEPA's performance in the preceding and current years to put the future targets in context of past performance;
- a forecast of expenditure and income taking into account of guidance on resource assumptions and policies provided by the Department at the beginning of the planning round;
- additional forecasts derived from alternative scenarios and estimates, and the effects of these on the achievement of SEPA's objectives; and
- for the first year of the plan, additional detail showing the underpinning plans and processes to be pursued to deliver the stated objectives and targets.

A Work Programme in the Overall Plan translates the goals, objectives and indicators into activities for the day-to-day work in the period covered by the strategy.

EPA, Ireland

The Irish Environmental Protection Agency produced in 2000 its first corporate plan covering a three year period from 2000-2002. The Statement of Strategy sets out the Agency's strategic objectives and corporate goals, the strategies to achieve them and the indicators of output and outcome against which the Agency's performance can be measured.

The Statement of Strategy outlines the Agency's five Environmental Business Programmes and two Business Support Programmes:

Environmental Business Programmes

- Monitoring and Reporting.
- Environmental Research.
- Regulation and Enforcement.
- Environmental Performance of Local Authorities.
- Information/Education Advice and Communications.

Business Support Programmes

- Organisational Support Programmes.
- Information Technology Services.

The major elements of the Work Programme 2001 included:

- The licensing and regulation of large/complex industrial and other processes with significant polluting potential.
- The monitoring of environmental quality.
- Development and implementation of an air quality monitoring programme.
- The further development of environmental quality objectives for various media.

- Ensuring compliance with the Water Quality Standards for phosphorus regulations.
- Improving the public understanding of the environment and environmental issues and promoting greater public involvement in the protection of the environment.
- Generally overseeing the performance by local authorities of their statutory environmental protection functions.
- The further development of the Agency's organisation and regional facilities.

All initiatives are described as projects with aim, outputs, activities, schedule of work, resources and responsibilities (see section 8).

The sub-national Inspectorate Business Plan may contain the following sections:

- Background.
- Mission, vision and values – if possible derived from or inspired by the national administrative level.
- State of affairs with number of employees, professional skills, number of installations etc.
- Overall and specific structure.
- Strategy with rationales, including goals, objectives, targets and activities.
- Indicators, means of verification and assumptions.
- Budget.

3.4.2 Action plan

On the operational level, the inspectorate may develop annual action plans covering the complete operation of the organisation, tying goals and objectives to action. The Action Plans should describe inspectorate activities leading to desired deliverables and achievement of objectives (see also section 8.2).

Inspection plans specify the inspection activities for installations to be inspected, including frequency, time, resources, and budget planning. They should also describe compliance assistance and promotion activities and should allow time and resources to carry out administrative or any unexpected tasks.

The EU Recommendation on Minimum Criteria for Inspection ¹² states the following concerning inspection planning:

- 1) It is a minimum criterion for inspections that there should be a Plan for inspection covering a defined period (for example annual) for a defined area or organisation and with fixed terms for revision and specifying which types of installation are covered.
- 2) A plan for inspection should be based on the following:
 - A database/register of industrial installations.
 - A survey of the regulations and conditions to be complied with.
 - A general survey of major environmental problems and a general survey of the state of compliance by industrial facilities with regulatory and other requirements.
 - Performance indicators and data on previous inspections, for example frequency of inspections; resources used; non-compliances etc.

¹² Recommendation of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections in the Member States (2001/331/EC).

- 3) Plans for inspections should reflect the industrial installations covered and should prescribe for the planning period:
 - the precise scope and extent of the programmatic and systematic compliance checking to be carried out, eg. in the form of inspection frequencies for a priority list of installations and for each type of installation;
 - the procedure for ad hoc inspection eg. inspection in reaction to accidents, complaints, non-compliance situations and permitting processes.
- 4) Plans for inspection must be appropriate to the inspection tasks of the body and resources available in the context of the tasks to be completed.
- 5) In relation to specific sites, the preparation of plans for inspection should take into account relevant available information eg. reports by operators of industrial installations to the authorities; self monitoring data, audit and EMAS reports; results of previous inspections; reports of environmental quality monitoring.

Action planning also includes specifying responsibilities and timeliness with each objective – who needs to do what and by when, as well as it may specify the resources needed for accomplishing the plan, including personnel and money. By this, action planning comes very close to project planning (see section 8).

The Flemish Community, Belgium

The Environment Inspection Plan 2001 of the Environment Inspection Section contains three groups of activities: *Campaigns* are enforcement activities effected in a planned and co-ordinated manner. This group is subdivided into projects, actions and research assignments.

Routine inspections form the basis for the policy of the presence on the site and ensure that the chance of a control is not related to a campaign or a complaint, for example.

Reactive inspections are carried out following an appeal that has been submitted to the EIS.

Follow-up (enforcement instruments): File preparation, observations on site, inspection report etc.

3.4.3 Workload planning

It is not easy to precisely determine the necessary resources for carrying out the tasks of the inspectorate. From year to year the situation will differ, depending on factors such as the number of pollution incident, number of complaints, number of new enterprises that need permitting and inspection. In a reactive complaint driven system neither need or use of resources can be planned. The planning approach emphasises the need for prioritising your work, deciding how much time could be used on complaints, and how much time should be used on the most important tasks of the inspectorate.

With the action plans the inspectorate has developed a starting point for estimating the need for resources. However, in many cases inspectorate resources are fixed and activities must be adapted to the budget given. Irrespective of the practical circumstances, the manager must secure effective coherence between goals, activities and resources.

Staff experience from previous years is an invaluable guideline for estimating the resource need for activities of different kinds. A division of the inspectorate obligations in main tasks – including requirements originating from policies and quality systems – with an accompanying assessment of the amount of resources needed for each task are useful tools for resource calculations.

Time consumption on the individual inspection activity depends on:

- Is it a first time inspection or a follow up check on specific issues?
- The size, nature, risk, location and complexity of the enterprise.
- Number of identified violations.
- The experience and competence of the inspector.
- The performance, competence, and attitude of the enterprise.
- etc.

The one-year plan of Österåkers Inspectorate is based on a mixture of experience and qualified forecast of resource need. A quantified estimate of the total need for resources if all potential tasks should be accomplished is developed into a selective plan illustrating the choices and preferences of the Inspectorate. The spreadsheet is subsequently used to monitor progress and actual time consumption during the year.

Österåker, Sweden									
Österåker Municipal Inspectorate as estimated its resource need with a table illustrating the need and the actual resource allocation. The estimate of the needed time includes the requirements from the Minimum Criteria									
Object	Estimated Resource Need			Inspectorate Plan			Follow up		
	Actions	Time/action	Need	Actions	Time/ action	Need	Tertial 2002		2002
							1	2	
	Number	Hours	Hrs/year	Number	Hours	Hrs/year	Hrs	Hrs	Hrs
Waste Water Treatment Plants > 25 PE	50	10	500	25	10	250			
Petrol Stations >1000 m3	10	3	30	10	3	30			
Electroplating	4	2	8	4	2	8			
Small Repair Shops	50	3	150	25	2	50			
Total			236			112			

Each inspector is required to insert time used for different tasks on a daily basis. The inspection plan is linked to the budget system and the time report system so that planned work is compared to actual achievements and budget outcome as a background for a prognosis three times a year, 1st and 2nd tertial and a final outcome at the end of the year. This makes it possible to redirect resources and priorities during the year and to have a good background for the plan for the next year. It also makes it possible to assess the outcome of the work both in terms of money and in terms of actual work which is the linked to certain key factors.

NOTE: These figures are not generally applicable for all inspectorates, as the time set aside for each activity is only relevant for the specific inspectorate and / or country. Another inspectorate with, as an example, much longer transport distances or more comprehensive requirements to reporting may use much more time on each inspection visit.

The annual inspection plan should be seen as a flexible tool to direct the work in accordance with the inspectorate priorities. If the staff finds that plans are used more for control than for goal oriented design of the inspectorate's work, trust - both internally and externally - will suffer.

SEPA, Scotland

The Scottish Environment Protection Agency has developed a Workload Planning Spreadsheet that is a tool for setting annual workload levels for SEPA's main activities. SEPA has centrally fixed standard times for the majority of workload activities. In circumstances where it is felt that the standard times set are not appropriate and regional managers have the discretion to adjust these.

The agreed position for planning is that a minimum of 5% of field resources nationally will be dedicated towards environmental improvement through action plans in addition to routine inspections. In addition team resources are allocated to development of various systems and projects.

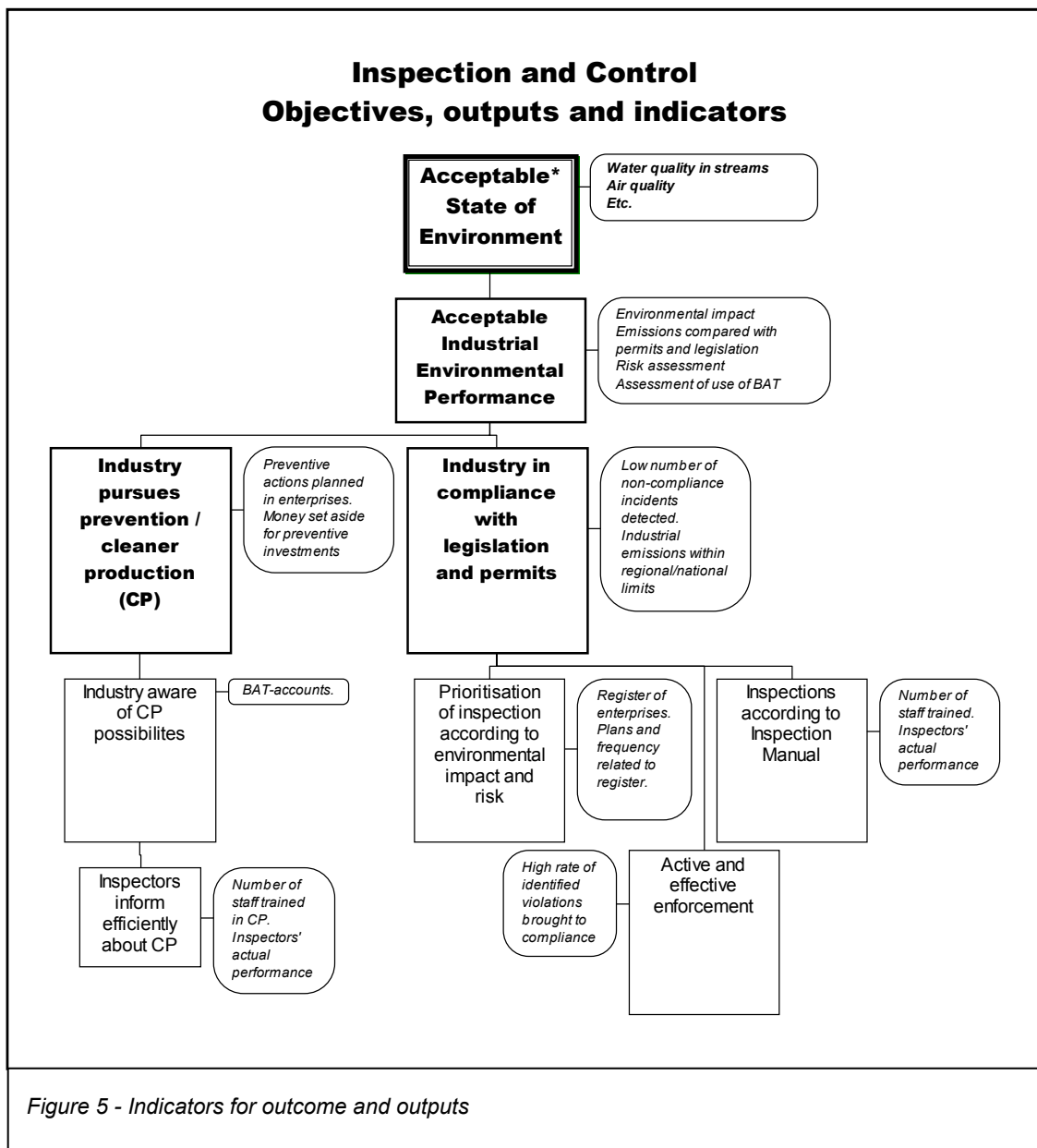
The plans help the inspectorate to become result-oriented instead of time-oriented. Time should be used for obtaining tangible results, and this should be reflected in the inspectorate time registration systems (chapter 8).

Resource planning at this stage involves a certain amount of “Trial and error”: Inspectors carry out a certain amount of inspections and other tasks. If the field of responsibility is covered within the satisfactory time and without too many complaints or errors, you have succeeded. On the other hand, if things are moving too slow or with too many errors (or with waste of time) you will have to readjust resources or field of responsibility.

The targets used by the inspectorate should reflect guidance and provide a complete picture of performances against expectations. Continuous monitoring of targets is necessary to provide information about the need of changes of inspectorate achievements. Where the results differ from the plans, the inspectorate should assess and document the reasons for the differences and the associated risks.

3.5 Indicators

Indicators are used to monitor and demonstrate progress in achieving outcomes, goals, objectives and outputs. As the work of inspectorates has a long term purpose, the environmental outcome of the inspection work cannot be recorded immediately.



Traditional indicators of performance count activities (or outputs) such as the number of inspections conducted, and enforcement actions taken through the year. However, these indicators fail to:

- Include new assistance and incentive approaches.
- Measure environmental outcomes from the work.
- Characterise the state of compliance in key populations.

Relevant and credible indicators provide a management tool for analysing programme performance – and at the same time provide a response to the increased demand to demonstrate results of government activities.

It is often not possible directly to measure the effect of inspection work and this is why indirect indicators may be used for illustration of whether results and development seem to be reached as planned¹³.

Indicators may provide information on issues as:

- State of environment.
- Industry's environmental performance.
- Inspectorate staff competencies.
- Inspectorate performance.
- Etc.

Figure 5 illustrates an example of the use of indicators in inspection work. It is not possible to measure the environmental impact of the inspection work in the short run. Therefore measuring relates to the two immediate objectives: Industry pursues prevention and Industry is in compliance with legislation and permits¹⁴.

Indicators should as far as possible be linked with monitoring systems. Therefore, decisions on indicators highly influence system requirements for monitoring and reporting of state of environment, enterprise performance, and inspectorate performance.

3.6 Assumptions

A strategy should be a living tool for improving the performance of the inspectorates. It is a large challenge to maintain the dynamics from the process of strategy formulation in the period where the strategy is valid. Identification of indicators and assumptions and subsequent monitoring on both enables the manager to adjust the strategy when necessary.

It is not at all easy to formulate the correct assumptions and risks - this implies not only good knowledge of the work area but also a good imagination and a certain level of prophesy competencies. A group discussion is the best tool for identifying relevant assumptions.

¹³ In UK such surrogate indicators are known as “proxies”.

¹⁴ In this context it is important that permit limits are appropriate to reach environmental targets.

Relevant assumptions could include:

- Number of inspection visits that an inspector can carry out within a certain time limit.
- Number of complaints received and handled within a certain time limit.
- Full staff and resources according to the plan during the entire relevant period.
- No major unforeseen environmental incidents will occur during the entire relevant period.
- The political vision and priorities do not change during the period.

3.7 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing inspectorate strategy.

- Does the inspectorate have a strategy that builds on the mission statement, vision and values?
- Does/do the strategy/strategies translate the mission statement and vision into goals and objectives and set out the means to deliver them?
- Are strategies developed on the basis of co-operation and consultation with inspectorate staff in order to clarify and focus goals, objectives and action plans?
- Are strategies developed in consultation with those that the inspectorate regulates, other stakeholders and the public?
- Are the strategies based upon an evaluation of the present state of the inspectorate, legislation and political priorities, stakeholder analysis, condition of the environment and the environmental performance of those that it regulates?
- Are strategies communicated (forming the basis of discussion) to those that the inspectorate regulates, other stakeholders and the public?
- Do the strategies set out defined success criteria?
- Do the strategies provide a benchmark and indicators against which actual performance can be measured and reviewed?
- Is performance against strategy goals and objectives routinely reviewed, and the strategy revised as necessary?
- Are goals and objectives formulated to be SMART (Specific, Measurable, Achievable, Realistic and Time bound)
- Is workload planning carried out so that coherence exists between action plans and resources?
- Does the inspectorate produce an overall plan, setting out priorities, targets and resources for the coming year?
- Does the inspectorate produce an annual report setting out progress against priorities and targets as set out in the annual business plan?

4 Leadership and Management

Inspectorate managers face different and partly (sometimes completely) contradictory expectations from many stakeholders. Being an effective inspectorate manager requires both leadership and management skills to be able to balance many elements, for example visions, stakeholder and staff concerns, and the need for efficient performance of the inspectorate.

The manager's role covers two main functions: "Leadership" and "Management". The differentiation between the two roles is not only of academic interest, as it explicates important managerial decisions and variances in style that have a huge impact on the entire organisation.

Good leadership sets the direction of the inspectorate by expressing visions and values, formulating strategies and supporting staff in co-operation. Leaders aim at effectiveness by guiding the inspectorate in the right direction. The capacity to shape a vision of what can be achieved, and to share the vision with others so that it becomes their own, is one of the most important elements of leadership. Good leadership, demonstrating organisational values and good use of delegation, inspires the staff to perform at their best.

Good management develops explicit systems that co-ordinate and secure that the inspectorate moves towards clear objectives. Systems may comprise planning, defined job-descriptions and structures, control and quality measures and reward systems.

Main differences are drawn up in the table beneath:

Leadership	Management
Explicate and demonstrate principles and values	Deal with the practical implementation
Aim at effectiveness by formulating, revising, and focusing at goals	Secure efficiency by developing and maintaining systems that promote productivity
Work at the strategical level – "Where to go"	Work at the tactical level – "How to get there"
Release staff competence and responsibility by empowerment and delegation	Regulate staff performance by systems and control

4.1 Good leadership practice

One important role of the leader is to provide the best possible conditions for the staff to be as effective as possible. The quality of leadership determines to a large extent the success or failure of an organisation. Characteristics of effective leaders change with times and cultures. However, certain features are essential to run a well-functioning inspectorate:

Be trustworthy, honest and consistent. Trustworthiness is based on character and competence. The leader is a role model for the staff and should pursue trustworthiness by always demonstrating in practice the visions and values of the

inspectorate. The leader must develop his/her professional competencies to constantly improve and to keep up with new challenges. At the same time the leader and the managers must seek alignment to provide staff and stakeholders a consistent picture of the inspectorate.

Empower the staff through involvement, delegation and loyal support. Delegation of competence, knowledge, responsibility and information to individual staff members and working in teams ensure a strong position for making ‘the right decisions’ at an appropriate level of the organisation. Competence-building and good physical and mental working conditions allow staff to exploit their full potential. A not fully appreciated aspect of empowerment is that the manager should avoid presenting solutions early in a problem solving process. Aiming at empowerment, good management acknowledges the value of solutions that are gradually developed among the staff with timely assistance from the manager. Support to staff is needed especially when flaws appear – this could be when the leader seriously demonstrates empowerment.

Be proactive and take responsibility. Ineffective people transfer responsibility by blaming other people or circumstances. Effective managers accept the responsibility of their performance on the belief “Quality begins with me” – and work constantly on improving their performance. Evidently, self-reflection and assessment of own performance is as important as continuous reflection on inspectorate performance as a whole.

We must become the change we want to see.
- Mahatma Gandhi

Be enthusiastic, visionary, visible and creative. The inspectorates’ resources are often limited and balancing stakeholder interests can be difficult and potentially conflict-ridden. There is a huge need for enthusiastic, visionary, visible and creative leaders that can motivate the staff and initiate new solutions to problems.

Be goal-oriented and effective. Managers must be aware of inspectorate goals and objectives, and be able to prioritise their activities to deliver organisational goals. Developing an organisational mission statement spelling out the inspectorate vision and values is a key implementation tool. Subsequently inspectorate priorities should be scheduled in conjunction with key roles and goals.

Seek win-win solutions. Seeking win-win solutions means that both parties in a dialogue are profiting from the process and the results. Internal benefits can be considerable and may result in improvements in performance. This approach could foster a more co-operative relationship with industry and stakeholders.

Be communicative. The root of many problems lies in a failure to communicate effectively. Managers have an important role to play in ensuring good levels of understanding through good communication in a two way process. Empathic listening brings about clear understanding of needs and ideas, whereas honest and considerate speech enables clear understanding of the management point of view.

Be informative. If the staff are expected to take responsibility, the manager must make sure that they are informed about what goes on in the organisation. Managers could pursue information sharing on a daily basis by¹⁵:

- Creating an open atmosphere where staff members seek information from management in the belief that they will receive what they need.
- Having frequent informal and formal conversations with staff members, listening to demands for information.
- Taking into account that written information is often not sufficient if not followed up by presentation and discussion.
- Holding frequent meetings with the staff.
- Providing specific information.
- Delegating for example technical issues and inviting to presentations of specific subjects.

Hessen, Germany: Basics of cooperation and leadership

A decree for basic cooperation and leadership is introduced in the administration of Hessen since October 1995. The main elements for the cooperation between the superiors and members of staff are:

- arranging the goals of staff members for a specified period (a “contract” between superiors and each staff members is prepared and at the end of the year the success is discussed
- principles of delegation
- control of the results by the superiors
- trust and team working
- information and communication
- motivation, appreciation and critic
- promotion and advanced vocational training
- common coping with conflicts.

An important instrument of cooperation is a talk once every year between the superior and the member of the staff. During the talk both parties analyse successes and problems of cooperation based on the eight main elements above mentioned.

4.2 Management types

The management style should match the staff’s job maturity (see chapter 5). Whereas independent and highly professional employees seek constant challenges, it is not recommendable to delegate many tasks to employees that are not capable or willing to carry out the task. The table beneath illustrates how different managerial styles are applicable under different circumstances. The table illustrates that although the manager may assert a specific style, good management implies assessment of each individual and application of different management styles when necessary.

¹⁵ Information sharing is in addition an obvious subject for a system, see chapter 8.

Staff Job Maturity		Management Style	
Low	Cannot Will not Does not dare to (Maybe: does not bother to)	Try to motivate and empower Give instructions Give orders Inform of decisions Disciplinary reactions	Authoritative
	Can something Will maybe Does not dare completely Is insecure	Motivate and empower Guide Train Persuade Discuss the problem	
	Can Will Dares Does not know if he is allowed to	Involve Support Consult Involve in decisions	
High	Can a lot Will a lot Dares a lot Seeks influence	Delegate authority Delegate responsibility Delegate tasks Review leader role	Democratic

When staff demonstrates low job maturity, the manager must work with two set of tools: One is to try to motivate and empower the staff through open trustworthiness, open dialogue and moderate delegation. The other is a certain amount of authority demonstrated in directing, deciding and issuing orders.

With greater job maturity a more democratic management style is possible. The manager is confident that the staff are responsible and resourceful people that are able to plan their own work and contribute to inspectorate strategies. The manager creates security, facilitating change and high tolerance – a mistake is not a disaster, faults and errors occur and should be learned from.

Being democratic is not synonymous with being familiar and soft. Also the democratic manager exercises a certain degree of control, but performing his/her duties, the manager assumes the responsibility for his/her actions and is receptive to the views of the team.

4.3 Motivation through delegation

Delegation is a way of putting the resources of the inspectorate to the best use. By allocating responsibility and spreading influence, delegation benefits both operation, the stakeholders and the individual staff member. Delegation at its best:

- Improves effectiveness and efficiency of the inspectorate.
- Creates responsibility, job satisfaction and self-confidence.
- Frees resources at management level to perform leadership and planning.
- Facilitates problem-solving among involved staff members.
- Encourages staff development and sets up career opportunities.

The multi-targeted and broad spectrum of work in the inspectorate provides excellent opportunities for delegation. As no manager is able to deal with all the complex issues of environmental inspection, including handling several different stakeholder interests, many fields of responsibility can be delegated to staff members. A key-concept of delegation should be to “synergise”, to make use of each staff member’s individual abilities, qualities and development needs.

Extended delegation means enlarged personal autonomy. This may lead to mistakes and insecurity, until the new role has been learned. The frames for the delegated tasks should be very clear in order to guarantee the consistency of the system. Getting things done is not always what is most important. There is value in allowing others to learn, even if the task is not accomplished as quickly, efficiently or effectively.

Delegation should be carefully considered as the manager should accept responsibility for the quality of the work of the staff. Significant errors in task accomplishment do not only put a strain on the responsible staff member, but also compromise the manager who in the end is responsible towards stakeholders.

The manager can try to avoid some well-known pitfalls in delegation by:

- Illustrating the special talents and qualities that make it possible to delegate tasks to the person concerned. This will reduce the risk of others getting the impression that they are being passed over.
- Distributing the tasks among the staff, involving as many as possible in decision-making.
- Avoiding delegating only boring tasks or practical tasks – delegating also thinking, deciding and authority.
- Avoiding delegating tasks that are too difficult for the person in question. Aim at providing all staff a mixture of inspiring and more standardised tasks custom-fit to the individual wishes and competencies.
- Letting delegation and training go hand in hand.
- Discussing the amount of time required for delegated tasks with the person in question to reach a mutual understanding of the scope of the work in order to avoid over-delegation.
- Discussing the required feed back from staff to managers, including form of feed back or possible reporting system.
- Confirming the right to fail and to receive supervision, especially when dealing with new and demanding tasks.
- Following up and showing interest during the work process, primarily to support the employee, but also because in the end the manager will be blamed for unsatisfactory results.
- Accepting (within reasonable limits) results that are different than expected, being open to alternative solutions.

4.4 Improving performance – appreciative inquiry

Organisational performance consists of a mixture of successes and failures. Very often the point of departure for performance improvements is an analysis of the problems that occurred during operation. The aim is typically to avoid recurrences by clarifying rules and procedures. In many cases this approach has worked fairly well - detailed discussions of performance flaws and management insufficiencies *may* lead to elaboration of an improved organisational performance. However, one should not ignore the risk of motivation reduction due to the focus on organisational failures or the risk of intractable problems caused by focus on management or staff insufficiencies.

More sustainable performance improvements may be achieved by focusing on the organisational successes through application of “appreciative inquiries”. The method is based on three assumptions:

- In all organisations and among all staff members there are success stories containing a large potential for development.
- Development takes place, building on experience. Taking positive experience as one’s starting point eases the way to successful progress.
- Investigation, analysis and development go hand in hand. When an investigation is carried out, the process of development is initiated.

Appreciative inquiries focus on the things that work in the organisation. Thorough investigations and discussions on the organisational and individual successes provide an understanding of when and how the inspectorate functions best and the background for success.

4.5 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into improving leadership and management.

- Do managers practice leadership in the form of communicated visions and strategies?
- Does management communicate and demonstrate inspectorate values – for example trustworthiness, empowerment, responsibility – in the daily work?
- Does the inspectorate have policies and systems in place to develop and encourage good management practices?
- Does the inspectorate have an understood and practical system for delegation?
- Does the inspectorate use delegation as a means to motivate staff, by providing development and career opportunities?
- Do managers routinely exchange good practice and information with other managers?
- Do managers routinely communicate good practice and information to staff?
- Do managers and staff routinely review inspectorate successes and failures to improve operational performance?

5 Personnel

The staff is the inspectorate’s most important resource. Without competent, committed and responsible staff the manager is unable to deliver environmental goals. Thus, recruitment, competence building and motivation of staff are among management’s most essential functions. It is important to retain staff skills whilst also offering development and progression opportunities.

<p>SEPA, Scotland</p> <p>According to its staff management responsibilities the Scottish Environment Protection Agency will ensure that</p> <ul style="list-style-type: none"> ▪ the recruitment of staff is based on fair and open competition and equal opportunities; ▪ the level and structure of its staffing, including gradings and numbers of staff, is appropriate to its functions and the requirements of efficiency, effectiveness and economy; ▪ the performance of staff at all levels is satisfactorily appraised for the purposes of performance pay; ▪ its staff are encouraged to acquire the appropriate professional, management and other expertise necessary to achieve SEPA’s objectives; ▪ proper consultation with staff takes place; ▪ staff are treated equitably irrespective of race, religion or disability; and ▪ adequate grievance and disciplinary procedures are in place.

5.1 Need for additional competencies

Determining the competencies needed for fulfilling the tasks of the inspectorate embrace both professional and personal analyses.

The term “job maturity” concerns the staff member’s professional knowledge and skills (task maturity) and commitment, loyalty and attention to one’s duties (personal maturity). A staff member may have different maturity levels in different situations and in connection to different types of tasks. Common criteria for assessing employees’ job maturity are:

Job maturity for staff

Task Competence	Personal Effectiveness
<ul style="list-style-type: none"> • experience • planning capability • problem-solving capability • analytical capability • responsibility • precision • follow-up ability • communication • negotiation 	<ul style="list-style-type: none"> • self motivation • judgement • willingness • assertiveness • persistence • commitment • initiative • independence • team-working • creativity • discretion

Managers should tailor their managerial style according to team and individual maturity (see chapter 3 – Leadership and Management). These factors should furthermore be taken into consideration while elaborating competence development plans for the individual inspectors.

As many factors – for example legislation, politics, enterprise performance and attitude, culture, public interest – are influencing the work of the inspectorate, a precise prediction of the resource need is seldom possible.

A review of inspectorate tasks, the SWOT-analysis and the strategic action plans provides a good idea of the competencies needed for carrying out the tasks during the coming year, if possible and desired supported by interviews with staff and stakeholders.

The inspectorate must consider whether its need for additional personnel and competencies will be most effectively met by a generalist, who is able to deal with all elements of environmental output, or a specialist who is able to work more in depth with selected issues. Both categories are needed in the inspectorate.

	Specialist/s	Generalist/s
Advantages	<ul style="list-style-type: none"> • competent advice within specific areas of competence • high quality of knowledge on both specific regulation and technical issues • principal of several persons controlling the same object • 	<ul style="list-style-type: none"> • one contact person for the enterprise • total overview of the situation of the enterprise • good co-ordination capabilities • possibility to elaborate a monitoring plan for the whole environmental impact

In cases where inspectorate resources are inadequate external experts can assist with fact finding or other activities. This may relieve the inspectorate and provide specific high level expertise - for example in organisational development, sampling, or selected industrial sectors - that is not readily available within the inspectorate. Disadvantages are that external experts are more expensive than internal resources, measured per man-hour, and that the competence and experience created through the work is not anchored in the inspectorate.

In case of inadequate resources it may be considered to co-operate more closely with neighbouring inspectorates by exchanging specific competencies or by more general experience sharing. This may in some cases eliminate the disadvantages of using external experts.

5.2 Hiring of new staff

Since an inspectorate needs solid scientific, economic, legal and practical expertise to support its decision-making, it should be able to select and reward adequately qualified staff. Recruiting of new staff members is a decision of large importance for the individual as well as the organisation. Every case requires an analysis of the inspectorate's need for additional competencies and provides an opportunity for reallocating work tasks and mandates among staff members.

Recruiting of skilled people to the inspectorate is not an easy task. It is often more feasible to transfer another experienced inspector to the vacant position and then employ a new staff member with general qualifications to undertake the more basic tasks.

The staff should be involved in the employment process, for example by contributing to clarifying the need for competencies and participating in job interviews.

By preparing a job description for the vacant position the inspectorate makes sure that precise requirements are established. At the same time the job description enables the inspectorate to assess applicants against predefined and specific criteria.

Candidate's Name: John Doe	
Job Title: Food Inspection Expert, Environmental Inspector	
Job Description: Inspection of medium sized polluting installations	
Key Duties:	Job Characteristics
<ul style="list-style-type: none"> - Inspect technical aspects; - Co-operate with permitting authorities; - Draft notifications and enforcement reports; - Provide feed-back to policy level; - Specific responsibility for food sector; - Contribute to development of inspection tools 	<ul style="list-style-type: none"> - Will meet with clients and stakeholders - Requires technical skills - Lot of contact with stakeholders - Management of food sector inspection

Inspired by OECD: "Managing Inspectorates Strategically".

5.3 Best practices in training

The IMPEL project Best Practices concerning Training and Qualification for Environmental Inspectors was finalised in 2003. The main sections of this report concerns:

- Framework for training.
- Skills and competencies of inspectors and permit writers.
- Entry qualifications.
- Training.
- Management and assessment of training, skills and competencies.
- Tools for, as an example, assessment of training.

Further information on the project can be found on the IMPEL website (<http://europa.eu.int/comm/environment/impel>).

5.4 Introduction procedures

Starting in a new job is a stressful period for the new inspector (or manager). The gradual absorption of the new staff members is assisted by adequate introductory information about professional and administrative matters. The inspectorate should provide systematic and effective introduction for all employees joining the inspectorate and for existing employees who are transferred/promoted internally within the organisation.

The objectives of the introduction programme could be to¹⁶:

- Welcome employees to the inspectorate.

¹⁶ Inspired by the Environment Agency for England and Wales: Induction Policy and Procedures.

- Provide employees with information to assist them to “settle in” and become familiar with their working and social environment.
- Provide employees with an overview of the mission and goals, functions and work of the inspectorate.
- Brief employees on conditions of employment and policy/procedure issues in addition to legislative requirements.
- Ensure new employees are given an initial overview of the use of technology within the inspectorate.
- Ensure that existing employees, promoted or transferred to a new post, are provided with appropriate briefing/training.
- Ensure that new employees are provided with appropriate briefing/training.

Introduction should be recognised as an on-going process over a period of time rather than a one off event. The responsibility for a comprehensive introduction programme should be placed at management level, who, if appropriate, may appoint a mentor¹⁷ to assist and support the process.

<p>Västerås, Sweden Västerås Inspectorate has elaborated a checklist for introduction of new inspectors. The responsible persons and the new inspector go through the list during the first days of the employment. A mentor is designated to each new staff member easing the start-up process.</p>	
<input type="checkbox"/> Working hours / Salary <ul style="list-style-type: none"> - Key and identification card - Working hours, flex time, overtime - Lunchtime, coffee - Salary, pay day - Illness 	<input type="checkbox"/> Introduction to the Inspectorate <ul style="list-style-type: none"> - Introduction programme - Introduction to colleagues - The Inspectorate's mission and structure - Tasks and mandates - Co-operation with other authorities
<input type="checkbox"/> Data <ul style="list-style-type: none"> - Password - Data in general - Computers, network and software - Filing Templates Education	<input type="checkbox"/> Procedures Manual <ul style="list-style-type: none"> - Going through the Manual - Responsibilities - Defects and improvements - Revision
<input type="checkbox"/> Telephones <ul style="list-style-type: none"> - Introduction to telephone system - Messages in case of lunch, absence etc. - Information to switchboard about new staff member 	<input type="checkbox"/> Letters <ul style="list-style-type: none"> - How to write letters - How to fill out letterhead - Handling of post - Guidelines concerning emails and letters with personal attention
<input type="checkbox"/> Filing <ul style="list-style-type: none"> - Filing in general – principle of public access to records - System in archives - Who makes new files – and when - Borrowing a file from the archive 	<input type="checkbox"/> Quality Assurance <ul style="list-style-type: none"> - Background - How do we work with QA? - Importance of uniform approach
<input type="checkbox"/> Information and Media <ul style="list-style-type: none"> - Responsibilities - Contact with press and media 	<input type="checkbox"/> The Inspectorate Library <ul style="list-style-type: none"> - Where and what - How to order literature - Incorporating new literature

¹⁷ Mentoring in this situation requires someone to take responsibility for working with a new member of staff and answering questions as they arise, rather than trying to give masses of information at one sitting.

5.5 Evaluation and Development dialogue

The evaluation and development dialogue is a scheduled and well-prepared dialogue between the manager and the individual staff member, typically accomplished once every year. The purpose of the interview is to improve the inspector's job satisfaction and progress and enable a continuous development of the inspectorate.

It is important during the interview also to include “soft” issues such as co-operation and values.

Issues of the dialogue can be:

- The inspector's performance and results.
- The interaction between manager and inspector with mutual feedback.
- Present and future tasks and conditions.
- Resources and unused potentials of the inspector.
- Objectives and requirements for the coming year.
- Plan for development of the inspector's competencies in light of the action plans.

Depending on the national and inspectorate culture, managerial issues can be included as illustrated in the example beneath.

The dialogue should be open and honest and respect the manager's and the inspector's different roles and personalities. The meeting is confidential and committing for both parties – agreements should be written down by the staff member and reviewed at the following session one year later.

The following example reproduces a relatively comprehensive framework for the development dialogue, assembled from Danish and Swedish guidelines.

Development Dialogue	
Status on the previous year	
Issues	Comments
Follow Up on Last Interview <ul style="list-style-type: none"> - Which agreements have been realised? - What kind of competence development has been used? - How have the new competencies been used? - Which professional or personal development has been achieved? 	
Work Tasks <ul style="list-style-type: none"> - Most important work tasks - Balance between developing tasks, routine tasks, frustrating tasks - Work load - Strengths and weaknesses in concrete contexts 	
Job Satisfaction <ul style="list-style-type: none"> - Independence and influence on job - Co-operation in teams, projects, inspectorate - Circumstances that hamper work - Proposals to improve job satisfaction 	
Objectives and Task Solving <ul style="list-style-type: none"> - Evaluation of job contribution and quality - Evaluation of co-operation - Manager's expectations to the inspector 	
Manager Performance <ul style="list-style-type: none"> - Walk the talk - Ability to share relevant information - Dialogue about tasks 	

<ul style="list-style-type: none"> - Feedback on performance - Ability to support, organise, empower - Anything obstructing your job performance or satisfaction? 	
Other organisational matters <ul style="list-style-type: none"> - Structures and systems that hamper the organisation's development - Cultures that should be changed 	
Following year	
Issues	Comments
Objectives and tasks <ul style="list-style-type: none"> - Main goals, objectives and tasks - Criteria for success - Deadlines - New methods and co-operations 	
Development <ul style="list-style-type: none"> - Wishes and needs for development - Strengthen weak points – and utilise advantages - Wish for new constellations, tasks or placement 	
Need for Education <ul style="list-style-type: none"> - Need and wishes for education 	
Role in Organisation <ul style="list-style-type: none"> - Future role in the inspectorate - Future job - Ambitions for career: Project management, management, other 	
Conclusions	
Issues that we have agreed on changing:	
What the staff member shall do:	
What the manager shall do:	

A detailed assessment template may secure that the most relevant personal and professional issues are dealt with in the development dialogue.

Polish State Inspectorate, GIOS	
The periodic assessment of a civil servant in Poland is based on five compulsory criteria plus 3 up to 5 criteria that best suit to the post that is being assessed. The superior chooses the criteria after discussing the way of executing the duties with the servant who is to be assessed.	
Compulsory Criterion	Description of criterion
1. Reliability	Careful identification of the situation, using available sources, which guarantees the reliability of the presented data, facts and information.
2. Punctuality	Keeping to the legal deadlines for the performance of the given activity. Keeping to the deadlines appointed by the superior. Doing one's duty without delay.
3. The ability to use adequate regulations.	The knowledge of regulations essential for proper performance of one's duty (according to the description of the given post). The ability to look up necessary regulation. The ability to connect a regulation with the legal situation. Identification of cases, where co-operation with specialists from different fields is essential.
4. The planning and organisation of work.	Planning and organisation of work to fulfil one's duty. Precise identification of aims, responsibilities and time limits of a given activity. Identification of priorities, effective time management, creation of details and long-term, short term plans, possible to perform
5. Ethical attitude	Honest performance of duty, not arousing suspicion of partiality and mercenary. Taking care of a fine reputation. Behaviour according to professional ethics.
Optional Criterion	Description of criterion
1. Expertise knowledge	Knowledge that determines appropriate content of the executed tasks.
2. Technical devices operational skills	Proper level of knowledge and skills necessary for using computer and office devices
3. Knowledge of a foreign language	Knowledge of foreign language on a level appropriate to the tasks, allowing to: <ul style="list-style-type: none"> - reading and comprehension of documents

	- writing documents - speaking a foreign language
4. Attitude to self-progress, qualification improvements	Ability and willingness to learning and to improving qualifications, in order to owe the up-to-day knowledge.
5. Verbal communication	Formulating statements in a clear way which guarantees their comprehension, by: - concise and clear statements - matching proper language, style and contend of the speech with the listener - giving full and matter-of-fact answers even to a difficult questions, or criticism - expressing one's view in a convincing way - using matching concepts to the kind of affairs that are being taken care of/ work being done.
6. Communication in writing	Formulating statements in a clear way which guarantees their comprehension, by: - using established forms of correspondence - presenting the problems in a clear and concise way - matching proper language, style and contend of the speech with the listener - using statements correct logically and grammatically
7. Communication	Ability to build up a contact with other people by: - presenting respect to the others - trying to understand situation of the others - presenting interest in opinion of the others - arousing interest of the others in the employee's opinions
8. Positive attitude to a citizen	16. Orientation towards work results
9. Team working ability	17. Making the decisions
10. Negotiating skill	18. Coping on with crisis situations
11. Information management	19. Independence
12. Resources management	20. Initiative
13. Human resources	21. Creativeness
14. Quality Management of the Tasks Carried out	22. Strategic way of thinking
15. Management of the Implemented Changes	23. Analytical skills

5.6 Competence development

The tasks of inspectorates are constantly evolving reflecting changes in political, economic, industrial or environmental conditions and changes in public opinion. Therefore the staff competencies that the inspectorate needs also change over time. Equally important is that a skilled workforce requires professional and personal development to maintain work satisfaction – and that good systems for staff development enable the inspectorate to quickly adapt to new conditions, tasks and challenges.

As mentioned, competence building does not only concern professional skills, it is equally important to train staff in social and personal skills to promote good cooperation and personal development.

Planning of training may set out from different starting points:

- A review of the inspectorate's strategy and tasks provides a picture of the necessary staff competencies,
- Development interviews clarify the ambitions of the individual inspector,
- A Training Needs Assessment, TNA, accounts for the individual staff member's need for education and development seen in the light of inspectorate strategy/tasks and personal ambitions.

Preparation of individual competence development plans is an important management issue that should be dealt with in close co-operation with the individual staff member in the light of a review of the Inspectorate strategy and work plan¹⁸.

5.6.1 Training of managers

Managers of inspectorates face complex and comprehensive tasks covering all elements described in this book. Evidently there is a need also for managers' competence building aiming at effective management and improved inspectorate performance. New managers often need initial training to understand the management situation and the tools available for the manager.

Networking between managers both within the authority and with other authorities provides the opportunity of experience sharing with equals and is indispensable as source of inspiration to problem solving¹⁹. Management training courses may provide the double dividend of networking and professional input on selected topics.

SEPA, Scotland

The Scottish Environment Protection Agency (SEPA) had prepared a training programme for managers with the aim: "to provide managers with the tools and skills to support and deliver effective management of people, finance and associated systems and planning; and develop a culture which will move the directorate towards the stated objectives and targets. It will develop a supportive team oriented culture whilst at the same time give local management space to manage." The delivery of the agenda in terms of the stated outcomes and associated targets is seen as a demanding task. One of the key elements in the delivery mix is effective management at all levels – hence the priority for a programme of management development.

1. Leadership

- Research and evidence to support the need for great leaders in SEPA
- The leadership (and management) style necessary to enhance SEPA's operational performance
- Getting the most from people in SEPA Operations
- Getting people to deliver results in SEPA Operations
- Selecting the best people for the job
- Building and managing teams
- Making changes that produce real results and take people with you
- Ensuring that you are maximizing your leadership effectiveness

2. Financial Management

- The financial requirements of a manager in SEPA Operations
- Operating SEPA's financial systems and procedures to get maximum benefit for SEPA Operations and your people

3. Management Planning

- The management planning requirements of a manager in SEPA Operations
- Operating SEPA's management policies, systems and procedures to get maximum benefit for SEPA Operations and your people

4. Managing Change

- Deliver the required change by involving people and the benefits associated with the change

Common training courses for national and sub-national managers may increase the dialogue across the normal communication lines.

¹⁸ Refer also to section 9.3, Reward systems.

¹⁹ The IMPEL Peer Review offers a possibility for networking, see IMPEL web-page.

ESI, Latvia

A management training course for The Latvian State Inspectorate (ESI) and the Regional Environmental Boards aimed at (among others):

- Increased competence on leadership and management at top management level
- Improvement of the internal network between stakeholders within inspection issues

The course embraced the following elements (among others):

- Leadership & Management
- Workshop: "What is good leadership"

Management tools in the Latvian context

- Mission statements
- Strategic Planning
- Action planning
- Structure/Organisation
- Human Resource Development
- Budget management
- Time management
- Networking/Communication

Presentation of Home Work

- Inspection Strategy
- Inspection Plans

Managers at all levels – from national top level managers to sub-national project managers and team leaders – also need training and proper introductions.

Environment Agency, England and Wales

Acknowledging that team leaders do not automatically possess all relevant management skills, the Environment Agency for England and Wales conducts a series of long term training courses for project managers and team leaders, for example:

- Effective Project Management
- Team Leader Development – Leadership
- Team Leader Development – Communication
- Team Leader Development – Managing Money
- Team Leader Development – Health & Safety
- Team Leader Development – People & Performance
- Team Leader Development – Work Planning

5.7 Progress in job performance and roles

Transparency in expectations to the individual job performance is of great value for the organisation. Initial discussions of the realistic competence requirements will streamline the understanding between staff and managers, and both groups will benefit from a one year evaluation of the job performance (see above).

Precise descriptions of staff positions provide a good basis for the inspectors' work – and for the continuous development of their competencies.

Høje Taastrup, Denmark

Høje Taastrup Inspectorate has prepared descriptions of staff positions based on a mutual understanding of the inspectorate's tasks:

Inspectorate Tasks - Permitting, pollution and complaints

- environmental permitting of polluting installations, including wastewater licenses
- complaints concerning households and enterprises (smoke, noise, smell, waste)
- inquiries (and environmental assessment) concerning establishment and operation of different activities
- acute pollution, typically oil pollution of soil and ground water
- direction of waste to recycling, incineration, and land filling

Inspectorate Tasks - Inspection and follow up on:

- Category A, B and C enterprises, including farms
- tank installations for mineral oil products
- public water supply installations
- water treatment plants
- streams and rivers
- private swimming pools

Inspectorate Tasks - Planning etc.

- Environmental Data Base
- Sector planning for waste, wastewater, water supply and recipients
- Regulations for waste, streams, wastewater treatment plants etc.
- Inventory and registration of soil pollution and tasks connected hereto
- Annual plans and annual reports
- Assessment of environmental conditions and preparation of action plans
- Environmental management in the public sector

Inspector's tasks

The Inspector should be able to take part in all three working fields, though specific attention must be paid to the inspector's individual tasks as assigned by the manager:

- carry out active and investigative inspection as per inspection plan
- prepare, update and revise permits and licenses
- assess and solve cases with soil pollution
- prepare plans especially concerning control of wastewater treatment plants

The Inspector is the Inspectorate specialist within pollution from wastewater treatment plants. The Inspector should therefore follow development in the field and contribute to convert good ideas, new requirements etc. into administrative practice.

Inspector's responsibilities

- preparing objectives and plans in co-operation with the unit manager
- carrying out plans, follow up, evaluate and revise
- securing quality of the work in co-operation with the unit manager and colleagues
- securing accordance with legislation and internal procedures
- guaranteeing lowest possible resource consumption
- providing optimal service to customers

Inspector's Qualifications

- high level environmental education (bachelor or preferably masters degree)
- extensive knowledge of environmental legislation
- extensive knowledge of inspection and enforcement
- good ability in writing and computer experience
- experience within the specific topic: Wastewater treatment

Description of the requirements to and framework for the work of the individual inspector aligns expectations and assumptions concerning staff performance.

Hessen, Germany

The District Government of Darmstadt is using a system to describe and value the efforts of an inspector. The description is divided in following topics:

1. Job description as a list of five or six important tasks to be conducted by the inspector.
2. Description of the official connection during the actions (persons to inform, topics, targets) .
3. Level of independence in decisions, room of manoeuvre.
4. Range and potential consequences of the actions.
5. Management level (responsibility for personnel).
6. Level of the necessary experience.

The Environment Agency for England and Wales has elaborated a detailed plan for the first three years' professional progress of managers, team leaders, team members and specialists. The progression tables serve as a planning tool for education, training and development – and as a tool for evaluating staff performance. The approach is that the individual staff member in co-operation with the immediate superior discuss the tables, selects which competencies that are required to do the job and uses this list as a basis for progress planning and subsequent evaluation.

MANAGER – PROGRESSION IN ROLE PHASE 1

KNOW HOW	ABILITY	BEHAVIOUR
<ol style="list-style-type: none"> 1. Agency objectives, strategies, plans, funding and budgets. 2. Current Health and Safety Issues within own team. 3. Knows own and aware of Agency wide legislation, including powers, duties and roles. 4. Team management and team working practices. 5. All financial and performance management systems. 6. Key internal and external customer's history and current issues. 7. PDPs for all direct reports. 	<ol style="list-style-type: none"> 1. Implement Risk Assessments and develop Health and Safety Management Plan for own team. 2. Manages own business plan to reflect wider Agency needs and shows effective prioritisation. 3. Communicates business priorities and decisions of management team meetings to direct reports. 4. All aspects of financial and performance management carried out. 5. Communicate to outside world issues relating to own area of responsibility. 6. All direct reports are aware of the relevant policies and procedures and are able to implement performance management independently. 	<ol style="list-style-type: none"> 1. Gives feedback to direct reports and welcomes feedback from them to achieve self-awareness of own strengths and weaknesses. 2. Encourages improved team working practises. 3. Promotes improved service delivery. 4. Develops networks with external customers and identifies areas for future partnerships. 5. Promotes Health and Safety awareness through own behaviour. 6. Promotes self-development through sharing own PDP with direct reports.

MANAGER – PROGRESSION IN ROLE –PHASE 2

KNOW HOW	ABILITY	BEHAVIOUR
<ol style="list-style-type: none"> 1. Main issues from own part of Agency and how they relate to wider Agency. 2. Main goals, objectives, needs and values of key stakeholders. 3. Motivation behind goals of other parts of Agency. Including current successes, issues and progress towards goals. 4. Thorough understanding of the development needs of each direct report. 5. Thorough knowledge of own work area and all its issues. 6. Awareness of motivation, strengths and weaknesses of management team colleagues. 	<ol style="list-style-type: none"> 1. Chairs meetings and can deputise for manager in own management team. 2. Has gained confidence of key stakeholders and developed own network. 3. Works collaboratively with management team colleagues to share resources for common good of team. 4. Fully implement own Health and Safety plan and contribute to Health and Safety in management team. 5. Can field and answer all difficult questions about own work area. 6. Revises PDPs to meet individual and business needs and establishes own succession plans. 	<ol style="list-style-type: none"> 1. Contributes positively to team working with management team colleagues by helping resolve issues. 2. Adopts a helpful approach to customer. Fair, firm, objective, can explain decisions. 3. Has developed trustworthy relationship with all colleagues and seeks and provides support on an individual basis. 4. Promotes environmentally friendly working practices within own group through personal example. 5. Ensures own direct reports work effectively as a team. 6. Seeks out work opportunities to provide members of own team with development that cannot be provided through traditional training.

MANAGER – PROGRESSION IN ROLE – PHASE 3

KNOW HOW	ABILITY	BEHAVIOUR
<ol style="list-style-type: none"> 1. How and where to access expertise across the Agency. 2. Thorough understanding of National Issues and direction of own part of the Agency. 3. Anticipates issues and influences external agencies/partners before they react or demand. 4. Knows where to gather relevant intelligence and knows how to influence 	<ol style="list-style-type: none"> 1. Deputise for manager at their management team meetings. 2. Contributes to Regional/National groups. 3. Represent Agency view externally on a range of subjects/issues. 4. Can facilitate internal and external groups. 5. Can use business management techniques (SWOT, risk analysis etc) 	<ol style="list-style-type: none"> 1. Actively promotes management team decisions and Agency policy despite personal reservations or potential conflict. 2. Selects appropriate communication style/method depending on the audience and the message. 3. Galvanises and leads opinions with external groups and individuals in own area of expertise. 4. Uses understanding of individuals as basis

<p>opinion formers inside and outside the Agency.</p> <p>5. Understands customer requirements and influences expectation based on what can realistically be delivered.</p> <p>6. Understands the impact of change and draws up plans that reflect and address change "issues".</p>	<p>6. in management of own business. Deputises for management team colleagues so understands basics of their business.</p>	<p>for influencing taps into personal motivation and style, to persuade.</p> <p>5. Is known and respected by all staff in own part of Agency.</p> <p>6. Encourages and persuades other management team colleagues and all other staff to maintain a safe working environment.</p>
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5.7.1 Evaluation and self reflection

In this context both managers and inspectors should reflect on their job performance to assess the need for revised goals. Regular self-reflection could follow the following path:

1. Did you reach the goals, objectives and outputs envisaged (assuming Inspection plans and/or personal performance plans have been elaborated)
2. Are activities and budgets sufficient to reach goals and objectives in the next quarter?
3. If there are deviations in outcome, activities or budgets, comment on these and propose corrections.
4. Verify time schedule.
5. Verify case registration and dissemination.
6. Consider whether goals and objectives should be corrected according to changes in the environment or in political priorities.

Evaluations from colleagues/staff can provide most useful input for improved performance; relevant issues can be compiled from this Reference Book.

5.8 Working environment – physical/mental

Inspectors' physical and mental working conditions should be of high quality to allow the best possible working performance. Originally, the debate on the working environment focused on its physical aspects as the easiest to observe, measure and discuss. It is far more difficult to address the mental welfare of the staff, including work satisfaction, roles and relationships.

It is an obligation of the management to secure that the working environment is proper, that all regulations are observed and that the staff is informed about existing regulations. The responsibility of the individual staff member is to make sure that there are no compromises concerning health and safety.

An assessment of the working conditions can be carried out with a systematic mapping of the most important problems including potential risks of accidents. The mapping can be followed up by a plan of action that points out how and when problems and risks will be solved or minimised. The plan of action is both management's and staff members' tool to secure that the assessment results in real improvements of the working environment.

The mapping can be carried out as a survey of all relevant processes in the inspectorate. In the survey, physical aspects such as noise, vibrations, ergonomics, chemicals, and potential risks of accidents, and mental aspects such as stress, malice, harassment, lone work etc. are to be included.

The staff should be represented in the workplace assessment by involvement of an experienced staff member or the safety representative. Both the management and the staff representative should sign the final assessment.

In order to make sure that the assessment continuously gives a correct picture of the working conditions, the assessment should be revised regularly.

It is inevitable that inspectors face conflicts that may provide a great deal of stress to the inspector. The inspectorate should offer training in negotiation and conflict solving. Conflicts can be approached in different ways, depending on the situation. There are several ways to handle conflicts and each inspector will have his/her own style. The issue is dealt with in IMPEL Reference Book for Inspection, see IMPEL homepage.

Some practical items should be in place to reduce the risk of personal injuries or practical annoyances, among others helmets, safety glasses, safety shoes etc.

Høje Taastrup, Denmark

Høje Taastrup Inspectorate has carried out an inventory of all staff members' occupational health and safety conditions. Each of the points on the list has been discussed with the individual staff member.

If a problem is identified, potential solutions are described and the need for involvement of external experts and resources is assessed. If the problem is prioritised, an action plan is prepared with specification of resources, responsibilities and time frame – and the work is initiated. Issues may include:

- Office
- Noise
- Light
- Cleaning
- Temperature, heat and coldness
- Air quality
- Sight
- Ergonomic
- Stress

Subsequent to the work place inventory, an action plan should be elaborated to eliminate the problems that have been prioritised by the group dealing with occupational health at the inspectorate.

5.9 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing inspectorate personnel.

- Does the inspectorate have shared and understood personnel policies in place?
- Do managers employ a flexible range of management styles that can be tailored to specific situations?

- Does the inspectorate routinely analyse skill gaps and future competence requirements?
- Does the inspectorate tailor recruitment and training programmes to meet future competence requirements?
- Does the inspectorate provide systematic and effective introduction for employees joining the organisation, or for existing employees transferring to new roles?
- Does the inspectorate routinely set individual annual objectives for staff, that can form the basis of performance evaluation?
- Do managers routinely hold evaluation and development interviews with staff to discuss performance, job satisfaction and development needs (personal and professional)?
- Are inspectorate training plans linked to individual development needs and plans?
- Have inspectors been trained in conflict handling (see IMPEL Reference Book for Inspectorates)?
- Is an assessment of the physical and mental working conditions regularly carried out?
- Are the most important occupational health problems being taken care of?
- What mechanisms do you use to motivate the staff

6 Culture of the Inspectorate

No clear consensus exists on how to define the culture of an organisation. In this context culture is defined as something common for a group, something that makes the organisation stick together: physical arrangements, ways of communication, traditions and history. Every organisation has a culture, but most cultures have developed half unconsciously, without direction from specific management goals – but significantly influenced by management values and attitudes.

6.1 Cultural differences

Inspectorates are part of political systems with different attitudes concerning inspection and enforcement and quite different approaches to goals and results of the inspectorate. The economical context is a part of this question and resources normally reflect political priorities. There are also differences in the legislative frameworks and legal systems that the inspectorates operate within.

Also national cultural context sets the framework within which the inspectorate operates (possibilities and barriers). Differences in culture between the countries, from south to north, east to west, may mean that methods and tools applicable in one country are not useable in another.

Cultures of inspectorates differ largely across regions and borders. It must be recognised that cultural differences cannot easily be referred to in few words, but some facets concerning the relationship between management and subordinates that influence the possibility of revising the organisation will be pointed out.

One aspect is known as “Power Distance”, the distance between management and subordinates. In some countries it is common for managers to discuss major questions with (selected) staff before decisions are taken. In some other countries management takes decisions and informs subordinates afterwards. In some cultures the discussions decisions with subordinates may be regarded as weakness.

A second point of Power Distance is the use of titles. Where it is quite common in some countries that managers and staff call each other by their first name, the daily greeting in other countries may require that the staff member addresses the manager (or vice versa) with use of a formal title. In some cultures also people at the same level address each other with titles.

Another major cultural aspect is “Uncertainty Avoidance”. In some countries it is common that there are both formal and informal procedures for the work and actions of the subordinates. When passing the limits of these procedures it is expected that the subordinate consults with a superior before further action is taken. In other countries the staff has typically wider limits and autonomy and may therefore take decisions and actions widely relying on their own judgement.

The above examples illustrate the weaknesses that exist when you try to generalise on cultural differences between countries and people and try to prescribe European wide best practice.

6.2 Cultural elements

The proximity of the Inspectorate to those that it regulates and to central Government has an important effect on its culture. An inspectorate that is part of central Government will probably have a different culture to a more autonomous regional or local inspectorate.

The inspectorate culture is also strongly influenced by society, Government, other organisations and stakeholders. The influence may come from elements such as:

- History.
- Political and economical situation.
- Traditions, rituals, ceremonies etc.
- Religion.
- Society values and paradigms, for example view on democratic values, view on women's position in the society, the view on authorities etc.
- Language.

These conditions are to a large degree aspects beyond the managers' circle of influence. They can not be influenced by the management, but they can be understood, hereby giving management better opportunities to foresee pitfalls and possibilities.

The inspectorate culture does also embrace elements that are unique for the organisation and that the management and the employees often have good possibilities of changing:

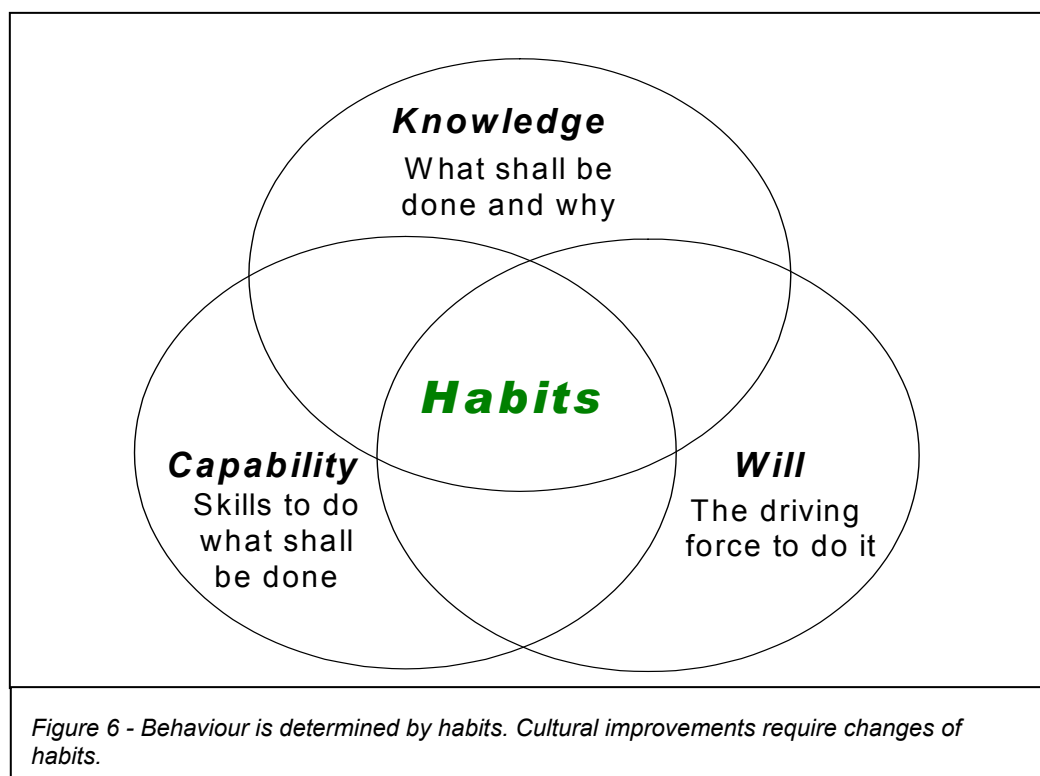
- Physical aspects – architecture, interior arrangement of the office etc.
- Appearance (behaviour, clothing, cars).
- Language and communication.
- Gender balance.
- Ways of co-operation.
- Sense of quality.
- Conflict solving.
- Relations to stakeholders.
- Enforcement attitude.
- Conventions.

6.3 Pursuing cultural goals

Every organisation has a certain culture, intended or formed by coincidence, and there are usually aspects of the inspectorate culture that need to be revised. Such elements may have evolved over time or for example been injected by newcomers. The manager is the most important culture bearer in the organisation and should not underestimate the importance of being in front in the process of renewing the culture.

One way to seek cultural changes is (in co-operation with the staff) to formulate goals on the type of culture that the inspectorate aspires to and follow up with discussions on how the goals can be made reality in the everyday life of the inspectorate.

Habits and formal guidelines effect the above-mentioned cultural elements.



Habits are formed out of our knowledge of what shall be done and why, our capability to do what is necessary, and our will to actually do it. Whereas formal guidelines can easily be modified, it is far more complicated to change habits that actually govern both implementation of formal guidelines and the cultural development.

If general habits are to be changed everybody must be aware of the fact that the process starts with the individual. Forming the inspectorate culture is the responsibility of every single staff member. As the culture is the sum of the individual behaviours, all must take responsibility for the inspectorate culture (though managers must accept that they play a particularly important role).

Habits can not be changed from one day to the next. It takes time and it is hard work. The management and the employees must set their minds on the fact that wholehearted changes of habits can take several years.

The power of habits is huge; habits are a strong force almost like the power of gravity. If you want to change deep-rooted habits that result in impatience, lack of capability to listen, mistrust, sloppiness or egoism, it takes more than just a little willpower or a few changes in everyday living.

Improving of habits calls for a contribution in all three dimensions (knowledge, capability and will – see figure 9). The employees and managers shall be ready to give up something in order to achieve something at a later stage. The process of change can take place in three steps:

Step 1: Knowledge

In the first step employees and management acquire the knowledge that is necessary to develop the culture. They must:

- Understand and agree upon reasons for developing the culture within given topics.
- Brainstorm, identify and formulate cultural goals.
- Comprehend the correlation between the behaviour of the individual and the culture of the organisation.
- Discuss and together eliminate uncertainty.

Step 2: Capability

In the second step the employees and the management during courses and other learning activities must learn the skills that are needed to change habits in the organisation. This can be skills within:

- Personal behaviour, for example assertive behaviour skills.
- Team working and co-operation.
- Technical aspects.
- Systematic solving of problems and handling of ideas.
- Communication.

Step 3: Will

On the basis of the acquired knowledge and capability the employees and the management in the third step build desire and courage so that every person starts working with the individual habits. The will for making a personal effort must be present in order to achieve the common goal.

Maintenance

Steps 1-3 bring to light the first positive results, cultural goals are met, but the process must not stop here. Bad habits can easily return if the new habits are not anchored in the inspectorate. The achieved capabilities must be maintained, and pitfalls must continuously be avoided through a direct dialogue between the manager and the employees.

The below example from the City of Copenhagen illustrates how an organisation can work with its culture. In this case the organisation wishes to develop a culture with focus on:

- The need of the whole institution rather than the need of the individual
- Co-operation with stakeholders
- Trust
- The future rather than mistakes in the past

The City looks at this as the first step in a process towards Value Based Management. The outcome is, if successfully carried out, better habits in the organisation.

The path to these improvements of the inspectorate culture corresponds to the above-described: The column *Need for development* states the knowledge that is needed in the organisation. The columns *Actions and new behaviour* and *Need for learning* state the capabilities that are needed in order to achieve the goal. The individual will to change behaviour and habits is stimulated through the discussions and the process.

City of Copenhagen, Denmark			
Challenges	Need for development	Actions and new behaviour	Need for learning
<p>Four main challenges:</p> <p>1. We must as managers and planners not act as individual professionals but be aware of the need of the entire institution</p> <p>2. As the context is very complex we must co-operate closely with other stakeholders</p> <p>3. VBM must build on trust that comes from trustworthiness. This takes time to build.</p> <p>4. We must think and act in a way creating new opportunities for environmental work. The starting point is the desired future, not past mistakes.</p>	<p>Two main needs:</p> <p><i>Development of social competences</i> Co-operation in teams is not easy. We need a thorough discussion of teamwork, based on the issue: "What is required from me to achieve well functioning team work".</p> <p><i>Reflection</i> In connection with increased delegation all managers and staff members must reflect more on their importance for the quality of the Inspectorate services.</p>	<p>Development of social competences</p> <ul style="list-style-type: none"> - be able to listen, really listen - be trustworthy and respectful - display insecurity - give and receive feedback - be able to create professional networks, small-talk, be visible - be inspiring <p><i>Appropriate job performance</i></p> <ul style="list-style-type: none"> - be honest - have trust in others - behave nicely and be service-minded - be focused on mutual goals - be proactive - take responsibility and prioritise - take initiative - create teamwork - be informative <p>Reflections on job performance</p> <ul style="list-style-type: none"> - be aware of basis for job performance reflections (visions, goals, environmental impact, procedures etc.) - running and structured reflections - use feedback from colleagues - consider relevance of tasks - increased planning - write down during job execution and reflection 	<p>Social competences</p> <ul style="list-style-type: none"> - Course in presentation techniques - Course in feedback and fruitful communication <p><i>Reflection on job performance</i></p> <ul style="list-style-type: none"> - Course in environmental impact - Course in project organisation - Seminar on project management, feedback etc.

6.4 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing inspectorate personnel.

- Does inspectorate culture conform with values and core principles stated in inspectorate vision and values?
- Are managers aware of their importance in developing and maintaining organisational culture ?
- If the culture of the inspectorate differs from common practice of similar organisations in the country, is this the result of a conscious effort?
- Does management deal with unwanted behaviour in a constructive and future oriented manner?

7 Structure

The structure of the inspectorate can be defined as the formal and informal division and co-ordination of activities and responsibilities between vertical and horizontal levels of hierarchy. The inspectorate structure should reflect environmental priorities and legally-defined responsibilities, and the number of possible structures are numerous.

The main structural challenges of the inspectorate concern the distribution of roles, decision mandate, and fields of knowledge within the inspectorate or available to the inspectorate. In most inspectorates the structure is under constant evolution corresponding to changes in the political landscape and development of the inspectorate's tasks, roles and responsibilities²⁰.

The choice of structure should depend on the particular context within which it operates, and one can hardly find two inspectorates having identical structures: Some inspectorates are centralised, some have (autonomous) regional and local units, some work with projects across hierarchies and units and so on.

Several factors may influence the choice of structure					
Scope of activity, for example pollution control or nature protection	Strategy, what are the most important present and future outcomes expected from the inspectorate, how will they be achieved	External environment: Political, economic, social	Culture of organisation – information sharing, co-operation	Size of organisation, increasing or decreasing specialisation	Complexity of the regulatory framework and instruments utilised

Delegation of tasks, responsibilities, and authority from politicians or central agencies to inspectorates is an important issue in determining the frame for the inspectorate – and guiding the managers' decisions on structure. A clear mission statement and a thought-through strategy are valuable tools for defining the structure.

Elements of the process assessing and redefining the structure should be:

- Review outside/overall structure of regulatory cycle.
- Review legal mandate, mission statement, vision and strategy.
- Identify tasks, responsibilities and priorities.
- Consider different possible structures, number of necessary hierarchical levels, co-ordination among units, centralisation and decentralisation of authority.
- Consider possibilities for task sharing with other regions/authorities (for example specialist units in different inspectorates).
- Consult Government, trade unions and maybe stakeholders.
- Decide on, discuss with mid-level management and selected staff, describe structure, allocate tasks, mandates, responsibilities and resources.
- Disseminate to staff and stakeholders.

²⁰ In chapter 2 on Leadership and Management, principles and impacts of different delegation strategies are described.

Experience from European inspectorates shows that

- Big complexity in tasks and stakeholder interests often lead to more de-centralised organisations as one manager is not able to cope with all questions.
- Increased external management and control of the inspectorate lead to more centralised and formalised organisation as management have a need for quality control and for documentation.

7.1 Different types of structure

The structure of an organisation is often illustrated with an “organogram”, an organisational chart, providing an overview of the organisation’s hierarchy and division of responsibilities. The major types of structure, that are described below, often exists in combinations within the individual inspectorate. A major consideration when establishing or changing structures is how to secure information between units and hierarchical levels – this should be reflected in the development of information systems fitting the chosen structure.

An organogram illustrates the mandates and tasks of the individual units in the organisation – providing additional information to stakeholders as illustrated below. There are many ways to organise the structure of the inspectorate, the following are examples illustrating the possibilities.

The **Issue (or “Product”) Divisional Structure** focuses at the results provided by the organisation (for example state of certain media or industrial sectors) and has greater orientation on customer service and satisfaction. Issue based structures may, however, be more expensive because more “functional” personnel may be needed and may cause dissatisfaction of customers when they are asked to deal with too many department.

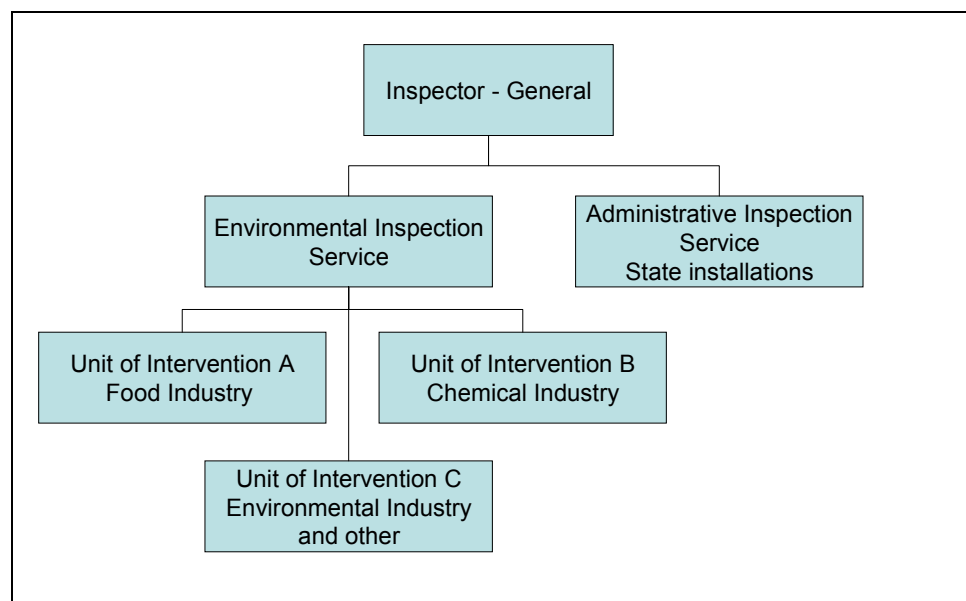


Figure 7- Portuguese Inspection Structure with four inspection units dealing with each their issues.

The **Functional Structure** is constructed around the division of labour according to several criteria and based on the experience that specialisation brings greater efficiency and higher output per person and that efficient staff development can be centred around standard types of functional skills. On the minus side, the functional structure risks creating a narrow perspective where common objectives are not perceived in their integrity.

The Flemish Environment Inspection Section is demonstrating how different structures can be utilised for different purposes. In the regional structure the local services are responsible for carrying out specific inspection tasks, implementing measures, keeping company files up to date etc.

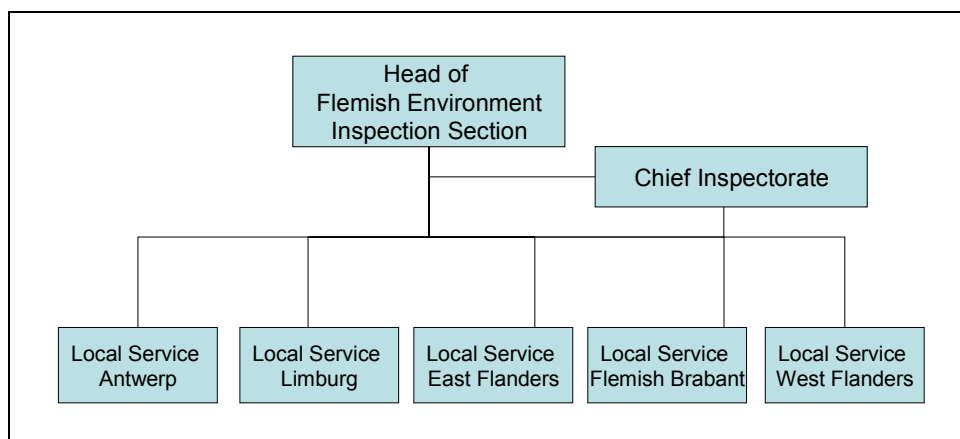


Figure 8 - Flemish structure with five regional service centres.

The functional structure has been set up in the form of working groups for each environmental compartment, each with participants from all five regions. The objectives of the working groups are:

- to co-ordinate, extend and disseminate the know-how available;
- to give greater depth to the planned and co-ordinated inspections and to raise them to a higher level;
- to ensure a uniform approach to environmental regulations (...).

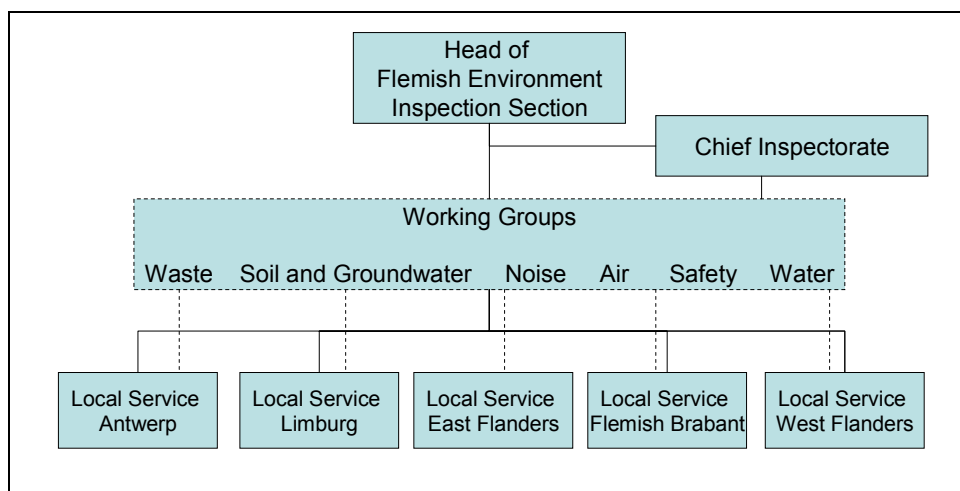


Figure 9 - Flemish Functional Structure

The **Geographical Divisional Structure** reflects the need to set up regional or local offices with a certain level of autonomy. This structure brings the benefit of “proximity” – to environmental problems, their causes and the general public to whom service is delivered. But, a narrow geographical perspective and focus on local problems and interests may hinder sustainable solutions of problems having a wider coverage/origin/interest.

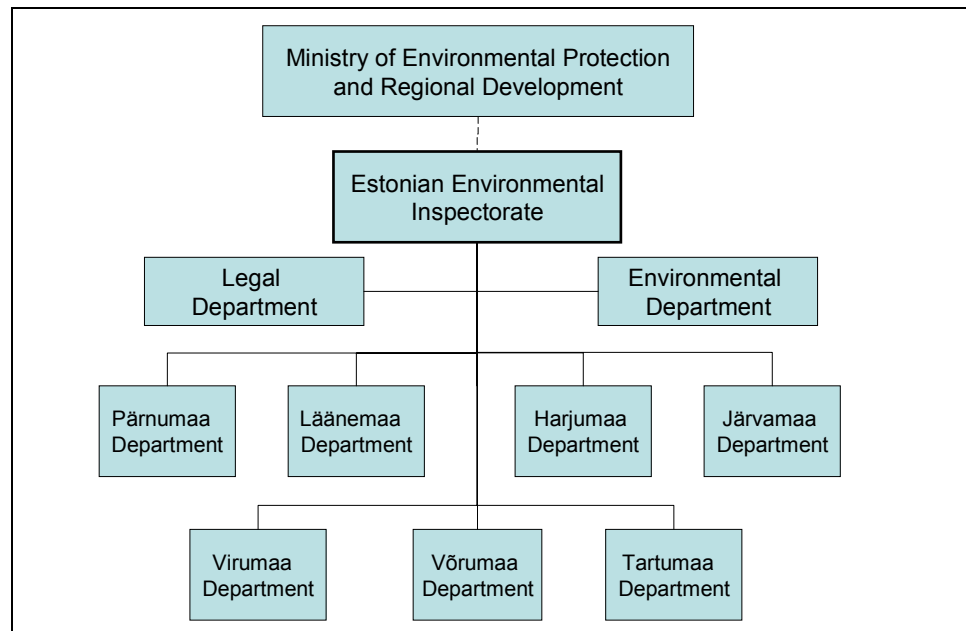


Figure 10 – Estonian inspection structure with seven regional departments subordinated the Estonian Environmental Inspectorate.

The Estonian internal structure reflects the geographical approach. The Environmental Department of the Central Office deals with general supervision in all fields of environmental and nature protection, organises training courses for regional inspectors and supports them in most difficult cases. The main idea is that also the regional departments should operate in an integrated way, ie. there is no division to air, water and waste sector and every inspector should be competent in all fields of environmental protection.

The **Matrix Structure** is constructed around projects where people work in a team to achieve objectives. Often, people working on projects have dual subordination to the manager of their permanent department and to the project manager. The matrix structure is advantageous for sharing information and enabling people to co-ordinate their efforts with larger organisational goals and strategies. However, dual subordination can be confusing, conflicts over personnel and budgets may appear, requires that several staff members have team management skills.

Inspector	Unit 1					Unit 2				
	KK	BA	NI	KF	FK	JH	IO	EH	VV	DK
Project 1	P		P				P		PM	
Project 2		PM		P		P				
Project 3			P		p			p	PM	
Project 4	P			P		P		PM		

P = Participant, PM = Project Manager

7.2 Decision mandate

The inspectors should always be aware of their authority and competence in a specific inspection situation.

Copenhagen County, Denmark

As a rule of thumb, politicians are informed about cases that can be politically interesting, which means that everything else is handled at the administrative level. Two inspectors sign all outgoing papers to secure quality. If local citizens or other groups show interest, information about the case is brought to the politicians.

If the Inspectorate finds it necessary to comment on the work of other administrative units – for example criticism of local authorities – the Head of Department deals with this in light of a dialogue with the politicians.

The mandate to take enforcement-related decisions should be delegated to, and taken at, the lowest level where issues can be effectively managed. To enable effective decentralisation, powers should be delegated proportionally to assigned responsibilities. However, it is also important that the inspectorate has adequate policies and systems in place to ensure that decisions are made using a consistent approach.

Österåker, Sweden

Examples from Sweden of powers to enforce the Swedish Environmental Code, delegated by the local political standing committee:

	Environment and Health protection		
	§§17-19 Regulations for Env & Health, §9 Local EH-regulations for Österåker	Applicable for installations up to 100 kW	Inspector
Take decisions re. environmental hazardous activities listed in the supplement to the Environmental Code as A, B or C installations			Assistant manager

7.3 Fields of knowledge

All inspectors and mid-level managers should be competent within general environmental issues. It is, however, impossible – and would be inefficient resource management – that all staff should be up-to-date on all relevant issues. A certain degree of specialisation is necessary to secure that the inspectorate is professionally updated. In order to perform integrated inspection, close co-operation is necessary.

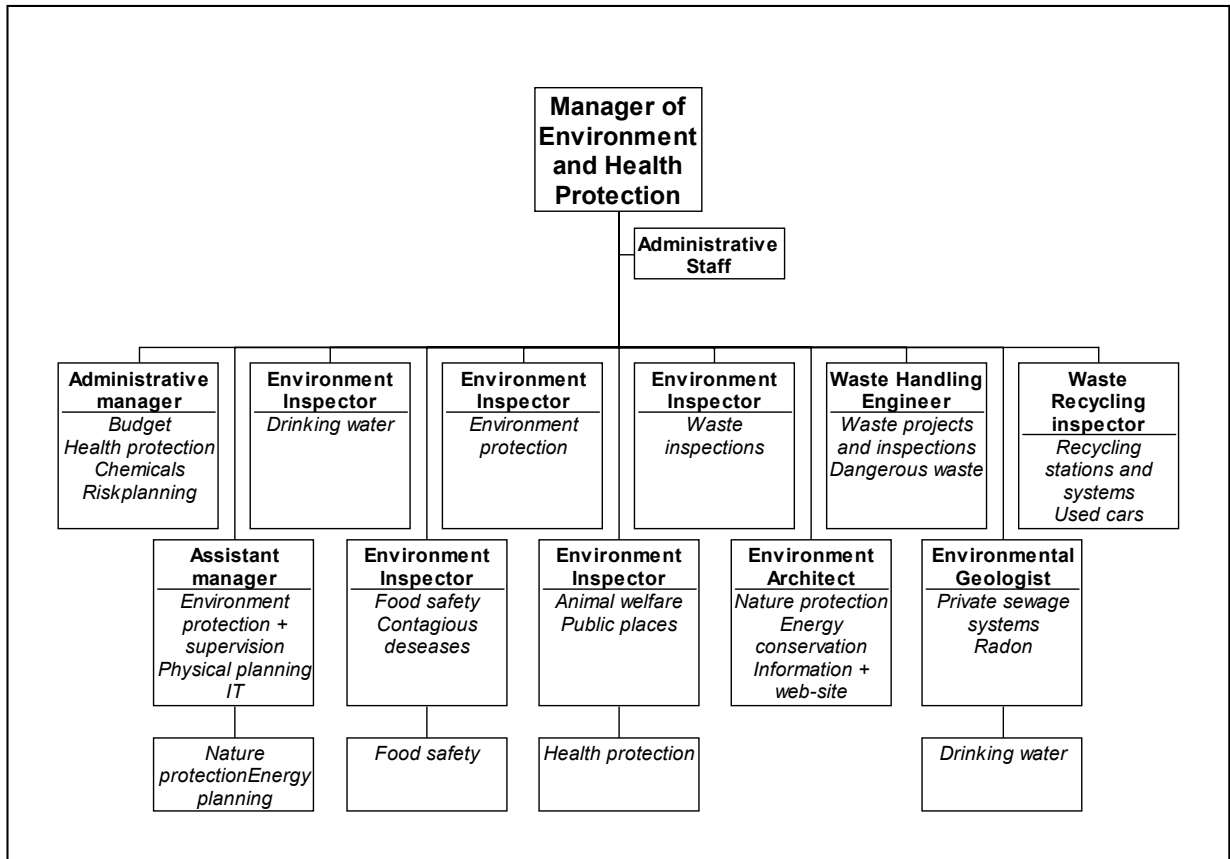


Figure 11 - Department of Environment and Health Protection of Österåker Local Authority, Sweden: Example of division of tasks and responsibilities among staff.

Most staff are trained as environment and health protection professional ("trained to be generalists") with some specialists among them. The staff work to a large extent in teams, tasks are distributed by the manager as primary and secondary responsibilities: Primary responsibility means to co-ordinate that task within the office and to make sure new legislation is taken on board and that tasks within that area is handled according to the work plan and the different check lists or rules. An important task being to keep management and colleagues informed. Secondary responsibility means that you are to act as a second and support the primary responsible officer.

A common challenge concerns the sharing of information between inspectors that may be time-consuming and complex. Managers can ease this process by supporting co-operation and information sharing to the largest possible extent. Information sharing could be an issue for a procedure, see chapter 8.

Copenhagen County , Denmark

Technical competencies are distributed among all staff. Inspectors come forward voluntarily to become Focal Points to obtain responsibility for selected professional issues like air emissions, the metal finishing industry, or the sensitive receiving waters in the region. The Focal Point collects all relevant information, training course offers, and legislation, becomes acquainted with the major contents, secures necessary changes in procedures and routines, and informs the rest of the staff about the most important news and events.

Issues for Focal Points can be identified during a brain storming process involving the staff.

7.4 Co-operation with other institutions

Since many institutions are involved in the environmental regulatory process, the need for co-ordination of activities and feedback among these institutions requires them to work in close co-operation. This will be crucial where there are, for example, separate institutions for environmental permitting, environmental inspection and of environmental health and safety. The responsibilities of the individual players should be defined as clearly as possible, with close attention to eliminating gaps and overlaps. Where appropriate, formal relations should be established through agreements (see section 8). They should identify the goals and outputs of co-operation, clearly delineate responsibilities, and describe lines and procedures of communication and conflict resolution.

Co-operation between sub-national inspectorates may serve several functions:

- Experience from successful inspection work can be utilised in other regions.
- Individual strengths may be utilised at a national or regional scale by establishment of professional focal points on for example industrial sectors or legislative issues.
- Arrangement of common training courses (and seminars etc.) may reduce training costs and increase training benefits
- Sharing good practice.
- Exchange of information.
- Development of consistent approaches to those that they regulate.

Italy

In 1986, in response to increasing pressure onto natural resources, the Italian Government took the unprecedented initiative of instituting a selected military corps to deter breaches of the Environmental Legislation.

Law n.349 instituted at once the Ministry of Environment and the NOE.- (Operational Ecological Nucleus) for the Carabinieri (the Italian National Police Corps under the Armed Forces).

The NOE Corps is staffed with personnel specialised in environmental legislation with a specific plan of interventions to tackle a wide range of environmental issues. Furthermore NOE intervention can be requested by the Environment Minister; the Judicial Authority (magistrates); the National Carabinieri Corps Headquarters; and Stakeholders, single or organised into societies.

During their inspecting surveys, the NOE is often supported by experts from the National Health Service, and the Carabinieri Scientific Investigation Department. In turn, NOE often provides support to inspections carried out by experts of the Ministry of the Environment and the National and regional Environment Agencies

The most common NOE inspections are in matters relating to soil and water pollution, refuse discharges, atmospheric emissions, landscape protection from urban development, flora and fauna. A significant contribution of NOE is in the deterring effect on organised environmental crime (environment Mafia) which is becoming a serious threat for the state of the environment. This sort of crime specialises in dangerous refuse handling, shipment, concealment. A web space within the Ministry of Environment web-site (www.minambiente.it) provides information about NOE activities.

If site visits are carried out by more than one inspectorate, co-ordination between the authorities should be assured by mutual knowledge of each other's plan for site inspections. The findings of site visits should be exchanged between the relevant authorities.

7.5 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing inspectorate structure.

- Is the structure of the inspectorate allow efficient and effective delivery of its mission, vision and strategy?
- Does the structure reflect inspectorate priorities?
- Is the management structure of the inspectorate clearly understood?
- If the structure of the inspectorate differs from common practice of other inspectorates, is this the result of conscious effort?
- Is there a clear and understood division of tasks and mandates between inspectorate units?
- Is the structure of the inspectorate understood and appreciated by management and employees?
- Do precise descriptions of staff positions exist?
- Is the staff aware of their authority and competence for example when in an inspection situation?
- Does the inspectorate actively encourage the sharing of good practice, information and co-operation with other institutions?

8 Systems

Systems comprise internal processes and procedures concerning activities, communication and decision-making that form the basis of the daily and longer-term functioning of the inspectorate.

No inspectorate can exist without systems and procedures, but different inspectorates need different systems. In some inspectorates a series of formal and informal procedures for the work and actions of the staff exist. When passing the limits of these procedures it is expected that the staff consult a superior before further actions are taken. In other inspectorates the culture is different, and both staff and managers appreciate large autonomy for the individual. The staff have wide limits and can from own judgement take decisions and actions that are not described in the systems.

The number and substance of the systems is decided on to ease the work, to improve effectiveness and efficiency in daily work, to avoid uncertainty and increase consistency in daily practices, to achieve the desired quality of the work, and to live up to external and internal demands, for example, reporting and documentation. The internal need for systems evolves as managers and staff evaluate values and strategy, look at other inspectorates' practices and acknowledge new needs.

By making information on inspectorate policies and systems publicly available it can increase the transparency and understanding of how and why inspectorate decisions are taken. This is particularly important where the decisions impact directly on others. For example the Environment Agency in England and Wales publishes its Enforcement and Prosecution Policy on its website. This allows those it regulates to clearly understand the reasons for what enforcement actions taken by the inspectorate (see box below).

Environment Agency, England and Wales

The Environment Agency in England and Wales publishes its Enforcement and Prosecution policy and guidelines (www.environment-agency.gov.uk). The policy aims to ensure that the inspectorate enforcement response is consistent and in proportion to the harm or potential harm caused by the pollution incident or breach of permit condition.

Supporting this is the Common Incident Classification Scheme (CICS) which enables the consistent classification of all pollution incidents. This is linked to the Enforcement and Prosecution Policy and guidelines so that a consistent enforcement response is made to incidents of comparable severity.

The Agency has also developed and is currently piloting the Compliance Classification Scheme (CCS) which operates in a similar way to the CICS, providing a consistent classification of breaches of permit condition, and a consistent proportionate enforcement response.

The total sum of systems should be transparent. It is essential to have exactly the systems and procedures needed for the specific inspectorate, rather than having as many systems and procedures as possible. Expanding the set of rules and procedures might imperceptibly move responsibility from the individual staff member to the systems, but may on the other hand release valuable time for more important tasks. The need for systems differs notably from one inspectorate to another and decisions about systems are relevant for discussions with staff.

Copenhagen, Denmark

Copenhagen County held a two-day seminar for all staff with focus on structure and systems in the inspectorate. The discussions revealed a need for the following systems in addition to the already existing systems:

- a system for management of tasks and resources that can ease the distribution of tasks between staff aiming at a fair work load for everyone.
- a system providing overview of the individual competencies, for example concerning legislation, industrial sectors, specific pollution, enforcement etc.
- procedures for the most important tasks, partly to ease the work, partly to secure uniform handling of similar cases
- system securing repeated review of the organisation
- a preventive quality assurance system securing high and uniform quality and enabling less control
- a library for the inspectorate

Among the relevant systems for inspectorates are:

- Overall quality management.
- Compliance assessment and enforcement.
- Permitting.
- Monitoring the environmental performance of polluting installations.
- Monitoring ambient environment / state of environment.
- Monitoring performance of the inspectorate.
- Handling appeals and complaints.
- Networking, co-ordination and exchange of good practice and information with other authorities and institutions.
- Reporting.
- Financial issues, including budgeting and issuing fees and fines.
- Communication to different customers and stakeholders.

8.1 Internal Quality Management

The public focus on the quality of public institutions' work is constantly increasing. There are also increased demands, limited resources, and decentralisation of responsibility. The aim of quality management and quality measurements is to improve fulfilment of goals and objectives. Deviations may be detected in time and corrections initiated.

Some inspectorates and ministries in Europe are working with standardised systems as ISO 9000 Quality Management, EFQM Excellence Model, ISO 14001 Environmental Management or EMAS- Eco-Management and Audit Scheme. These systems are extensive and require considerable input over a long period of time for preparation and implementation, why other inspectorates choose a less ambitious approach to quality management. It is an important management exercise to identify the needs of the inspectorate and implement systems corresponding to the needs.

A quality manual prescribing the harmonised and agreed approach to the most important inspectorate activities can increase consistency, efficiency and effectiveness. Description of procedures and methods for good inspection work is

important to maintain and increase the quality of compliance activities and to achieve a consistent case practice. However, most organisations with quality management manuals have realised that a quality manual does not provide quality by itself. Quality can only be achieved by successful implementation, training, audit and review of an effective system. Among the relevant issues are: Preparation, inspection, reporting, follow up; communication, negotiation; enforcement; data handling.²¹

Specifically, Quality Management may:

- Support staff in daily functions and provide knowledge about how legislation and administrative procedures are used in the daily work.
- Introduce all staff to the administrative processes and its contents in details.
- Secure consistency in administrative approach.
- Support continuous improvements with a feed back system.
- Give staff access to updated know-how and information.
- Aim at efficient and expeditious case handling without unnecessary administrative delays with use of sufficient and necessary resources.
- Minimise procedural errors.

Västerås, Sweden

Västerås Inspectorate has formulated quality demands within several topics, for example:

- citizens should have easy admittance to the Inspectorate, visiting hours and telephone numbers should be announced
- public servants must express themselves in an easily understandable manner
- case handling (letters, surveys, decisions etc.) should be carried out within reasonable time limits
- all decisions should be accompanied by information on appeal possibilities

To enable measurement of the quality the Inspectorate has formulated a series of tangible indicators elucidating the quality demands:

- rate of staff that have completed the plan for competence development (target: 80%)
- rate of citizens that know the Inspectorate and its responsibilities (target: 100%)
- rate of stakeholders who find that their case is handled within reasonable time (target: at least 70%)
- rate of stakeholders who find the Inspectorate highly competent (target: at least 70%)
- rate of stakeholders who have received good service from the Inspectorate (target: at least 70%)
- case handling time for inspection cases including follow up (target: 70% finalised within 10 days)

At the national level, comprehensive systems covering most inspectorate activities are developed in several countries.

SEPA, Scotland

The Scottish Environment Protection Agency (SEPA) has implemented a full Quality / Business Management System:

SEPA aims to operate as a quality organisation. A formalised Business Management System based on ISO 9001:2000 has been put in place to provide a framework for developing, establishing and reviewing quality objectives and performance against targets and to enable continual improvement.

In line with the principles of the ISO Standards, it is totally committed to meeting its customer requirements and to maintaining a focus on customer satisfaction and continual improvement. The Business Management System also supports its principal business processes.

²¹ The IMPEL Reference Book for Environmental Inspection (1999) describes numerous methods and examples for good inspection practice.

The system holds formal documents detailing both the corporate and local procedures that are used to ensure that quality is managed as an integral part of normal business. All documents are published to staff through an Intranet browser in categories based on their intended purpose:

- Business Policies and Strategies
- Environmental Policies
- Business Procedures – corporate processes and procedures which apply to all staff
- Work Procedures – catalogued within a directorate-based hierarchy depending on the team or department with responsibility for managing or undertaking the task defined. These included details of laboratory test procedures and methods.
- Forms / templates – standard input and pro-forma documents are incorporated within the system adjacent to, and linked to, the Procedure to which they refer.
- Responsibility, traceability and records

In compliance with the terms of the Quality Standards, SEPA has documented systems to operate and control

- formal equipment calibrations,
- internal quality audits,
- management of complaints, incidents and non-conformances to procedures,
- implementation of corrective and preventive actions,
- formal improvement initiatives,
- training records,
- annual management reviews of the effectiveness of the system.

The whole system is subject to regular external quality audit by suitably accredited assessment bodies.

Quality systems may provide guidance that goes beyond the typical description of procedures that staff should follow. The Agency Quality System in the Environment Agency for England and Wales among many subjects includes guidance for leaders and managers in preparation of visions and empowerment of staff.

Environment Agency, England and Wales		
The Environment Agency for England and Wales has implemented a Total Quality Management system comprising most fields of activity in the Agency. The system among others includes recommendations to managers how to cope with the different managerial challenges.		
Agency Key Business Process	Activity / Sub-process	Steps (or part of Agency where activity is carried out)
2. Lead the Agency and develop Vision, strategy and policy	2.1 Lead and direct the Agency	- Make corporate decisions - Empower and enable people - Provide leadership and embody the Agency's values
	2.2 Develop the Vision and strategy	- Develop the Agency's Vision - Develop functional strategies
	2.3 Scan the political, economic, social, technological, legal and ecological horizons	- Identify political and regulatory issues - Understand ecological pressures - Assess new technological innovations - Identify economic trends - Understand demographics - Identify social and cultural changes
	2.4 Develop and manage policy	- Select relevant issues and sectors - Conduct options appraisal - Consult on draft policy options - Approve policy - Communicate policy requirements

Division of work between staff members and guidelines for co-operation and for sharing of responsibilities are major tools for securing high quality in inspectorate outputs.

Copenhagen County, Denmark

Copenhagen County has introduced a system with two case officers on most cases. The purpose is to secure quality and continuity in case handling. By involving staff in formulating the procedures, the inspectorate management aimed at improving openness and knowledge sharing among colleagues. All inspectors have duties as both First and Second Case Officer.

Duties for First Case Officer

- establish constructive co-operation with Second Case Officer
- secure good case handling according to administrative and environmental legislation
- inform Second Case Officer about development in the case, including quality control of all outgoing letters
- keep information about the enterprise updated in the industry database
- keep the legal basis on the case updated
- sum up the case prior to transfer of the case to another case officer

Duties for Second Case Officer

- enter into constructive co-operation with First Case Officer
- keep oriented about the case
- manage the case in the event of illness etc. and if necessary take over
- participate in inspections, if necessary as referent
- read outgoing post
- relieve the pressure on First Case Officer in critical situations

The two responsible inspectors can handle most cases. More difficult tasks are discussed in teams, while only principle matters are discussed with the managers. To ensure professional flexibility and development, all inspectors are involved in at least two teams.

This structure results in considerable time savings for the managers, who can concentrate on strategic issues and development of the staff.

8.1.1 Process flow charts

A useful tool for illustrating process flows and quality procedures is the process flow chart. The chart leads the inspector through the elements of a task referring to the relevant procedures on the way.

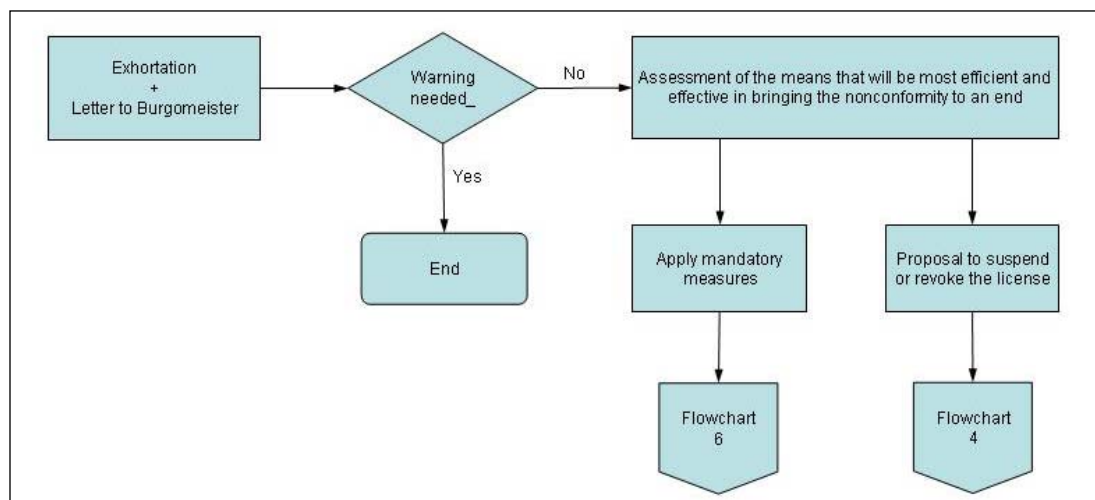


Figure 12 - The Environmental Inspection section of the Ministry of the Flemish Community guides its inspectors through all major tasks with flow charts and procedures. This flowchart shows the procedure to be followed when it is found that the environmental conditions are not being complied with by the operator. Guidance is provided in text and in connection to the subsequent flow charts 6 and 4.

8.1.2 Guidelines for inspectors

Guidelines, manuals and “Codes for good practice” for inspectors are important tools for achieving consistent and effective inspection performance. Among the relevant issues for guidelines are procedures for and inspiration to:

- Inspection, control and enforcement.
- Monitoring the environmental performance of polluting installations.
- Monitoring ambient environment.
- Monitoring performance of the inspectorate.
- Handling appeals and complaints.
- Networking, co-ordination and exchange of good practice with other authorities and institutions.
- Reporting.
- Calculating fees and fines.
- Code of conduct for inspectors.

Many of these issues have already been thoroughly dealt with by IMPEL, for example inspection, control and enforcement; self monitoring; and reporting. A list of IMPEL publications is provided in annex 1.

Guidelines, regulations and agreements directing the inspectorate staff can be embodied in a Staff Manual. The use of the manual helps the daily operation of the inspectorate as staff have a guide for their work and performance.

8.2 Code of Conduct

A Code of Conduct is not only important to the inspectorate and its inspectors but also to third parties that are in contact and work with the inspectors. Issues like integrity, independency, transparency, safety (job security as well) are all elements to be highlighted in the Code of Conduct. The Code of Conduct transparently sets out to staff and the outside world the standards of behaviour and attitude that are to be expected.

A number of elements can be considered for the Code of Conduct, especially the values and principles dealt with in section 2 of this report.

Flemish Community, Belgium

The Rules of good governance of the Environment Inspection Section of the Ministry of the Flemish Community in Belgium state that all interventions must take place according to the general principles of good governance. These principles can be subsumed into two categories: procedural principles and content principles.

a. Procedural principles

- duty to give a fair hearing
- impartiality
- duty to state the grounds of the decision

b. Principles as regards content

- fair play
- the principle of equality
- the principle of prudence
- the principle of legal security
- the principle of reasonableness

In fact, the Code of Conduct typically constitute a concrete guidance to inspectors of how major principles can be transformed into daily practice.

Ministry of Traffic and Waterways, the Netherlands

Among the issues dealt with in the Code of Conduct of The Ministry of Traffic and Waterways in the Netherlands are:

Professionalism

Professionalism means operating an entity with clear and workable processes and procedures. Management objectives and results are clearly defined. Towards their employees Inspectorate will show correct recruitment selection, adequate training and career opportunities and above all create proper working conditions. The Inspectors demonstrate professionalism toward third parties and will refrain from behaviour that may harm the Inspectorate. The Inspector will explain decisions and contribute to the understanding of these decisions to promote compliance with the laws in his field of competence. The Inspector will contribute to the Inspectorate Organization ideas and suggestions for improvement of its professionalism.

Integrity and independency

The community expects that the Inspectorate represent the highest values of integrity and reliability of the Administration and its personnel. The Inspectorate takes care that the discussion on integrity and independence is kept alive at meetings and decision taking processes as well as during personnel appraisal meetings in more detail.

The Inspector knows where to draw the line of his competences and his responsibility and will refrain from any suspension of non integer behaviour. Secrecy of information must be guaranteed by officials that is vulnerable to exploitation by third parties and is given in confidentiality as long as it does not interfere with the compliance and enforcement of its profession.

In connection to the above issues the inspector must avoid using knowledge of the financial situations in companies for own benefit; side jobs that interferes with his professional tasks; and even hobbies that are to tightly connected to his present job.

8.3 Appraisal of environmental risks

Several systems for improving effectiveness of the inspection efforts have been introduced in the EU countries, aiming at targeting inspectorate resources at those installations and activities that pose the greatest risks to the environment.

The simplest way of allocating resources to inspection and compliance control is to determine the need from one or several of the beneath parameters:

- Size of enterprise.
- Industrial sector.
- Enterprise requiring special permits, for example IPPC or Seveso.
- Enterprise location.
- Environmental systems in use.
- Management approach to inspectors and to the environmental issue
- past history of enterprise.
- Etc.

In order to secure the most efficient and effective use of inspectorate resources, the inspectorate should work out a set of explicit criteria supporting the allocation of inspection resources to the most important tasks.

Overijssel, the Netherlands

In the province Overijssel in Holland the environmental enforcement unit is working with inspection plans. These are documented reports in which, on the basis of a risk-analysis, inspection-activities are being prioritized and placed in an inspection-programme.

The inspection plans are divided in the following parts

1. Information of the installation and environmental profile. In this part general information about the installation (plant), the industrial activities and the concerned authorities, permits, reports by operators of industrial installations to the authorities; self monitoring data, audit and EMAS/ISO reports; relevant rules and laws, standards, agreements are described.
2. Monitoring-indicators. In this part the enforcement history, current enforcement affairs and reports of uncommon incidents are described. Also the monitoring of (non) compliance and achievements.
3. A schedule (index) in which industrial activities, risks/hazards and controlling-aspects are described.
4. A schedule (index) with enforcement-essentials
5. A schedule (index) with inspection programmes on enforcement-essentials.
6. A schedule (index) with a survey of executed inspections.

Working with inspection plans has shown several advantages:

- Inspection plans, developed in accordance with an approved standard and guide, are leading to inspections with more uniformity in enforcement;
- Because of the previously determined enforcement essentials in the inspection plans, more effective inspections can be carried out on specific installations;
- The inspections on installations and plants can easily be exchanged between inspectors and are no longer tied on only one inspector;
- The drawn up enforcement-essentials in the inspection plans can be used for planning and prioritizing;
- The standard and the guide of the inspection plans are drawn up in the certified quality system (ISO) of the environmental enforcement unit and therefore harmony with inspection plans is guaranteed;
- With the formulation of indicators an environmental compliance score can be given to permit-keepers. This can be used in planning and programming of the time to be spent on each installation.

8.3.1 Operator and Pollution Risk Appraisal System (OPRA)

The Environment Agency in England and Wales have developed Operator and Pollution Risk Appraisal (OPRA) systems which help them to target their regulatory effort (e.g. inspection frequencies) to those activities that present the greatest risk to the environment.

OPRA systems assist the decision making process by providing a consistent and transparent risk assessment framework. They provide an objective assessment based on an analysis of the hazard posed by the sector or installation (i.e. complexity, location and emissions) and the environmental performance and attitude of the operator/sector in managing that risk (e.g. quality of management systems and compliance history). The system provides quantitative data, which can be used as a basis for work planning, allocating resources and also measuring performance.

The use of risk based approaches can also provide incentives and rewards for companies to improve their environmental performance, with corresponding environmental benefits. More information can be found on www.environment-agency.gov.uk

8.4 Reward Systems

All organisations have reward systems (explicit or implicit) in the sense that “good” performance releases some kind of approval – in the form of for example praise, influence, further training, salary increase or promotion. However, the manager must make sure that there is a clear connection between the goals and values of the inspectorate and the behaviour that is rewarded. This is partly taken care of by elucidating the inspectorate’s policies, values and goals, partly by establishing transparent and coherent reward (and career) systems. Contradictions between inspectorate values and the reward system will promptly lead to confusion and discontentedness among staff.

An example: If inspectorate values emphasise the importance of co-operation and team-work, the manager should not reward inspectors that focus primarily on their “own” cases.

8.4.1 Transparent salary system

The basic inspector-salary can be fixed with a standardised progress scheme according to duration of service, position, additional education or others. In some countries it is possible to grant additional salary to individual staff members.

Where such opportunities exist, the manager through transparent criteria for wage determination may reduce the risk of disturbance in the inspectorate caused by wage related disappointments. This increases the staff’s comprehension of the reward system, provides substance to the salary discussion, and enables the staff to improve performance within specific fields.

In Österåker, Sweden, both the manager and the individual staff member assess the inspector’s performance within seven parameters before the wage discussion:

Österåker, Sweden	
Parameters for wage determination.	
<i>Demonstrate initiative</i>	
+	catch relevant news, problems etc. and propose actions
-	overdo initiative without anchoring in the organisation
<i>Independence</i>	
+	Individually plan (short and long term) and carry out own work
-	do this without considering the unity and other work tasks
-	be insecure and not dare / be able to handle questions
<i>Ability to develop</i>	
+	take on and involve into new tasks
+	be interested in learning and developing
-	be focused at the personal development and not development of the inspectorate
<i>Flexibility</i>	
+	Easily adapt to new conditions and tasks
+	flexible approach
-	not able to maintain focus or consequence
<i>Co-operation</i>	
+	independently inform and contribute to dialogue internally and externally
+	listen and respond readily to other’s viewpoints
-	initiate co-operation on every subject – large or small – at all odd times

<i>Professional skills</i>	
+	theoretical knowledge
+	practical experience
+	be able to seek relevant information or knowledge
+	competent as authority
+	be clear in writing and speaking
<i>Responsibility</i>	
+	accomplish tasks from beginning to end, "A to Z"
+	carry out tasks as prescribed in procedures, time schedules and work routines
+	Follow up on tasks and decisions
+	keep his/her word and be responsible for what has been done
+	be loyal to the inspectorate, colleagues and the work tasks

Name	Initiative	Independence	Development	Flexibility	Co-operation	Professionality	Responsibility	Comments
John	3 <i>4</i>	4 <i>5</i>	4 <i>5</i>	5 <i>4</i>	4 <i>5</i>	4 <i>5</i>	4 <i>6</i>	Impulsive
Karen								
Assessment rating from 1 (not approved) to 6 (excellent work)								

The first figure in each cell is the manager's assessment, second in italics is inspector's own assessment. The table serves first of all as a basis for dialogue.

Similar systems in other inspectorates may have more thorough background texts for the assessment, as in Høje Taastrup, Denmark, where the wage parameters provide input to discussions on performance, progress and priorities:

Flexibility	
Definition	Ability and will to undertake new responsibilities and tasks, modify the prioritisation of the tasks of the day and solve unforeseen tasks. Ready to
Maximum	Recognises the need for changes of responsibilities and working methods. Provides suggestions and contributes actively to implementation. Is very minded for changing work field. Is willing to take over or swap tasks with others. Interprets tasks flexibly and helps others with tasks, even though this is not stated in job description.
Medium	Is minded for changing work field. Do not mind taking over or swapping work tasks with others. Interprets tasks flexibly and helps others with tasks, even though this is not stated in job description.
Minimum	Is not very much minded for changing work field. Does not want to exchange tasks with others. Interprets tasks in a narrow way and does only rarely help others with their tasks.

Co-operation	
Definition	Carries out work together with others in fields where colleagues depend on each others contribution
Maximum	Takes responsibility for the total task. Assumes a leading role in the mutual contribution. Makes sure that the problem is solved.
Medium	Takes responsibility for the total task. Contributes to co-operation, but does not take a leading role.
Minimum	Takes responsibility for own contribution. Takes part in the task, but needs support and guidance from colleagues.

Quality of work	
Definition	Performs in accordance with Inspectorate objectives and criteria and procedures for the tasks
Maximum	Carries out work according to objectives and criteria. Contributes actively to increasing quality of the work.
Medium	The work is satisfactorily in accordance with objectives and criteria, though the performance is somewhat fluctuating.
Minimum	The work does only to a certain extent correspond to objectives, criteria and procedures. The performance is fluctuating.

8.5 Information Management Systems

The inspectorate should have an effective information system that would allow for gathering, storing and using data for decision-making. Systems vary in different environmental programmes and different countries, depending on the amount of information to be managed and on the resources available for information management. Where possible, computerised systems are valuable because they allow rapid and sophisticated information storage, retrieval, and analysis.

Information on the regulated community, on violations, and on inspectorate activities, is important to:

- develop priorities and strategies to most effectively use inspectorate resources;
- to monitor compliance;
- to monitor inspectorate performance;
- to evaluate progress in meeting inspectorate objectives.

Basic issues to address in planning of the information management system include:

- What information should be obtained?
- Who is responsible for obtaining it?
- Who is responsible for recording it?
- Should data be shared with other inspectorates or organisations (any regulation about this)?
- How long should the information be maintained in the files?
- What types of information analysis will be performed?
- Who will perform these analyses and how frequently?
- What, if any, information is confidential?
- What, if any, information should be released to the public?

The Netherlands

In the Netherlands, the government has embarked on a two-year programme to inventory the compliance status of the 900 companies that hold permits for processing hazardous waste. Inspectors complete a checklist for each company and transmit the results to a central computer. The information system is set up to generate sector-specific reports on compliance behavior, permit quality, and environmental impacts. The inspectors have received intensive training, supported by written materials, about how to obtain, record, and transmit data. The results are being used to support policy development for hazardous waste processing²².

8.5.1 Enterprise data

Compilation and storing of data about each enterprise should be well planned and if possible arranged with use of computers. The collection of data should as far as possible be co-ordinated with other authorities compiling data from the same entities.

In this context data management embrace:

- *Documents*, that should be registered to allow the inspector and others to retrieve the documents at any time and to fulfil the regulatory requirements for filing in the public sector

²² Parts of this section are inspired by INECE Principles of Environmental Enforcement,

- *Time-consumption*, that should be registered for each case to allow experience gathering, monitoring of performance, and collection of administration fee
- *Events* (inspection visits, random samplings, and enforcement actions), that should be registered to enable follow-up on each case, performance monitoring, and follow-up on annual planning.

Inspectors should directly share data with staff responsible for issuing permits. A formal information management system between inspectors and staff issuing permits should be in place – and especially when the two groups are not seated in the same building.

The information required on an inspection database may include the following²³:

- a) Characteristics of industries in order to group them according to predetermined criteria
- b) Administration of the permitting and inspection system
- c) Location of installations by region or area
- d) Contact information and permit number
- e) Details of the installation and the processes
- f) Permit types, conditions and other relevant data including expiry dates
- g) Inspection reports
- h) Reports on random samplings
- i) Reports on self monitoring or other reports from the enterprise
- j) Non compliance, enforcement actions, and complaints
- k) Environmental impact on media (air, water, soil)
- l) EMAS or equivalent audit information
- m) Documents concerning the Inspectorate's obligations as authority, for example inquiries concerning emissions.
- n) Complaints from neighbours if no specific file is drawn up
- o) Other documents specific to the case (depending on the enterprise and national procedures)

8.6 Communication strategy and procedures

Effective communication is one of the most fundamentally important tools of the inspectorate. As a public body doing a vital job the inspectorate must influence, and be responsive to, the public agenda²⁴.

The general public should have access to information on the inspectorates' activities and environmental performance of the regulated community. Beyond passively responding to requests for information, the inspectorate should pro-actively issue news releases and otherwise disseminate information. The general public should have the right to provide information to the inspectorate (for example complaints) and to have its concerns addressed.

²³ See IMPEL Report: Planning and reporting of inspections, Brussels 1999.

²⁴ This section is essentially inspired by SEPA Initial draft communication strategy, Sept. 2002.

It is important to direct information to different stakeholders very precisely to make sure that stakeholders receive, understand and pay attention to the information. Too little information can lead to holes in the basis for decision-making (which again can lead to wrong decisions); on the other hand too much information is a waste of time and resources and draws attention away from more important issues.

Different stakeholders need different information, and the inspectorate should reflect on who needs which kind of information. The inspectorate must consider stakeholders such as:

- Politicians.
- Government Departments.
- Enterprises.
- The public.
- Media.
- Other regulators.
- NGOs (nature protection organisations, trade unions etc.).
- Others.

Effective communication is not a one way process. The inspectorate must be a listening and hearing organisation. Good communication will allow the inspectorate to inform, understand, engage with and influence all the people who can contribute to improving the environment. Effective communication cannot be taken for granted, nor does it “just happen”. It requires a systematic approach.

SEPA, Scotland

The Scottish Environment Protection Agency (SEPA's) draft communication policy (2002) embraces elements as:

- All of SEPA's communication activities will be undertaken in pursuit of its main aim of improving the environment and contributing to sustainable development (there will be no “PR exercises per se”).
- SEPA recognises that good communications management is not “additional” to SEPA's business but a core part of the process of delivering its outcomes
- The motto “Credibility before Visibility” will inform SEPA communications. Public Relations will not be used to mask bad practice.
- SEPA will communicate in as clear and concise a way as possible, in ways appropriate to the audience

8.6.1 Communication plans

A system for communications planning may be based on a simple template. The approach is to consider, for any given issue, what the inspectorate needs to achieve, whom it needs to communicate with to achieve it, and that the most appropriate ways are for communicating with those people.

Communications Plans – a template from Scottish Environment Protection Agency

1. Aim – WHY do you need this plan

Briefly describe the issue/project and why a communications plan is needed. Define your main aim.

2. Key Objectives – WHAT do you need to achieve

List the main issues. What are the problems, opportunities, difficulties, complexities etc? How can PR techniques and good communications help the project? With this in mind, define the main objectives of the plan and the key success measures.

3. Key Messages – WHAT are the main messages you have to communicate?

Refer back to the list of key issues and list the main things that must be communicated. Defines the key messages.

4. Key Audiences – *WHO do you need to talk with and talk to?*

Refer to the list of messages. List the stakeholders with whom you need to communicate. Who do you need to *inform*, and whose views do you need to *listen* to? Think about their communication needs. Be careful not to make assumptions about the perspectives and views of the others, consider if you should do some market research to get a true picture.

5. Action Planning – *How are you going to get the right messages to the right audiences, in the right way, in the right place, at the right time?*

Consider the above. Always check that the actions you are proposing support the main aim and objectives.

6. Review – *How will you know if you have been successful?*

What performance measures are you putting in place? How will you capture and learn lessons to improve? When will you do a review?

8.6.2 Dealing with media enquiries

The inspectorate can work out procedures for contact with the media to ensure that the staff is ready to handle media enquiries in the most appropriate way. This may include training for those staff who deal with the media. It is essential that staff and managers, who are contacted directly by the media, do not feel pressured into providing immediate answers. Journalists are happy to accept that details have to be checked and answers thought through.

8.6.3 Information to the public

Proper information to the public and the business community facilitates the work of the inspectorate. As stated in the Minimum Criteria for Inspection, it is the responsibility of each Member State to demonstrate that the minimum criteria have been implemented. This may be achieved through regular (for example annual) evaluation and reporting of the inspection activities as a whole. It is a minimum criterion to ensure that such reporting is carried out. It is the task of the inspecting body/bodies responsible for environmental inspections in each Member State to produce a report on a predetermined and regular frequency. An important purpose of the report will be to demonstrate to the public the implementation of the minimum criteria for inspection.

The Flemish Community, Belgium

The Environment Inspection Section of the Ministry of the Flemish Community issues a yearly report dealing with the organisation and efforts of the Inspection Section. The 162 page report from 2002 contains information on:

- Organisation of the Inspection Section, including vision, values, strategy
- Personnel, training and resources
- Environment inspection plan
- Specific enforcement campaigns
- Routine inspections
- Reactive inspections
- Actions under criminal and administrative law
- Co-operation with others
- Involvement in consultative structures
- International context

While the above paper is mostly concerned with organisational matters and the activities of the inspectorate, other papers may concern the environmental development in and outside the inspectorate.

Copenhagen, Denmark

The City of Copenhagen has issued a series of leaflets and brochures with specific information aiming at selected target groups. Since 1999 most publications are also available on the internet. Among the publications are:

- Green Account for Copenhagen City
- Inspection of enterprises
- Leaflet offering lecturers from the City on specific subjects
- Air quality and Noise in Copenhagen

The leaflet *Environmental Inspection in Copenhagen 2000* contains the following sections:

- There must be room for the enterprises
- Polluting enterprises must have a permit
- The inspectors' work
- Enforcement
- New methods to improve the environment
- Status for inspection and enforcement 1999

Information from the inspectorate may also very well concern direct information to stakeholders influenced by inspectorate work.

SEPA, Scotland

The Scottish Environment Protection Agency has issued a folder explaining the role of the inspectorate to licence holders. The folder informs about a series of issues, among others:

- Introduction – what is the function of the inspectorate
- Getting in touch – what service can the license holder expect
- Applying for a license – how does it work
- Enforcing licence conditions – compliance is a must
- Consultation – an open dialogue
- Keeping you informed – SEPA information
- Putting things right – how to complain and appeal

The most important means of communication to citizens and stakeholders now a days is probably the internet, and some inspectorate websites are impressively comprehensive with information on numerous issues:

- inspectorate organisation, strategies, structure etc.
- inspection reports and complaints
- details of major permits
- sector and process specific guidance for businesses (particularly small and medium sized businesses) on how to comply with their environmental obligations
- information (on a GIS/MAP based system) that allows the public to check on the environmental quality near to where they live (or anywhere else), and also gives information on permits and discharges in their area
- environmental performance of the inspectorate
- environmental performance of selected enterprises.

8.7 Contracts with Inspectorate Units

The work of the individual departments, divisions, units etc. is planned while discussing and formulating strategy and activities – and allocated between the units according to the structure.

To maintain focus during the plan period a contract between the inspectorate and subordinated departments/divisions/units could be prepared, specifying:

- strategy goals
- objectives for the unit
- outputs to be achieved
- milestones, indicators and means of verification for objectives and outputs.

By joint negotiation and formulation of such contracts the involved manager and sub-managers achieve a shared understanding of the aims and measures of the inspectorate. Both sides should commit themselves to the objectives set up in the contract and target the results with mutual responsibility.

8.7.1 Description of services

A description of the inspectorate's services serves to inform stakeholders and customers about the precise content and scope of the services²⁵. The description may contain the following points:

- Background and objective.
- Legislation.
- Contents.
- Role and Remit of the inspectorate (what it does).
- Role and Remit of other organisations (what it does not do).
- Procedures and quality criteria.
- Costs.
- Delivery and results.
- Customer Charter with standard of services.
- Expected impact.

8.8 Organising Projects

Projects differ from case work by being based on formulated objectives, outputs, actions and input (resources, economy), by being closely bound to a time frame, and by being carried out by a team that often goes across the normal hierarchy and grouping. Introducing a project approach as alternative to the ongoing case-work implies an interesting potential for an inspectorate in development.

The project approach can:

- Contribute to solve essential problems and provide enhanced work satisfaction and yield.
- Improve the effectiveness of the organisation by clear project design.
- Contribute to personal development with new professional and personal challenges.
- Increase the inspectorate's ability to manage change and innovation.
- Improve the culture of the organisation by co-operation across the existing structure – and by working with stakeholders outside the inspectorate.

²⁵ The descriptions may also serve internal quality criteria.

- Provide experience of success when projects are well accomplished – or provide useful experience from projects that were not as successful.

Preparing a project

Initiative and ideas to projects can arise from various persons inside and outside the organisation. The continuous dialogue between staff and managers reveals many new or different needs, and knowledge of flaws or problems are disseminated. The staff identify and develop improvements of methods and procedures and at a certain time someone suggests a more comprehensive effort – a project.²⁶

The manager who entrusts a staff member to carry out a project should write down brief terms of reference (ToR) to the project manager:

- Background.
- Project idea.
- Desired outcome and impact.
- Organisational structure.
- Stakeholders.
- Financing.
- Reporting.
- Timeframe with milestones.
- Evaluation and success criteria.

The project manager may expand the ToR to a more comprehensive Project Document with emphasis on:

- Stakeholder interests within the issue.
- Objectives, which situation should be achieved after project termination.
- Outputs, actual results that should be produced during the project.
- Activities that lead to each result.
- Milestones and indicators for outputs.
- Requirements to reporting, what, when, to whom.
- Economy and resources, requirements for auditing.

Project objectives, activities, indicators and assumptions

Formulation of transparent and feasible project documents entails specification of objectives, activities, indicators and assumptions. Please refer to chapter 3, Strategy, for details.

EPA, Ireland

The Irish Environmental Protection Agency has formulated all activities in the yearly Work Programme as projects with aim; outputs; activities; schedule of work; resources; and responsibilities.

An example of the project approach is Project 103/2001: Staff Development and Training Programme:

Aim of Project

Prepare and implement programme of development and training for Agency Staff

Project Status

²⁶ This section is inspired by Guideline for Projects in Västerås City, 1998.

This is an on-going project

Planned Activities

- (i) Prepare a training policy and strategic plan taking account of recommendations of the Training Working Group, report of external assessor, Partnership Committee and the Statement of Strategy 2000-2002
- (ii) rs
- (iii) Participate in training programmes
- (iv) Evaluate training programme progress in mid year and make any necessary adjustments
- (v) Prepare annual report on last years training activities
- (vi) Prepare staff development (including mobility) policy taking account development needs and work priorities. Review assignments.

Implementation
This project will be implemented by EPA personnel

Resources

Corporate Affairs:	Administration 14 person months		
	Participation 10 person months	24 months	
Licensing and Control	Participation		17 months
Environmental Management and Planning	Participation		21 months
Environmental Monitoring & Lab. Services	Participation		18 months
Directors General's Office	Participation		1 months

Main Outputs

- Training Policy and strategic plan
- Annual Training Programme for Agency
- Annual Report on Training Activities
- Staff Development Policy

The IMPEL formula for Terms of Reference is divided into two sections:	
No.	Name of project
	Management Reference Book for Environmental Inspectorates
1. Scope	
round	
1.3. Objective of project	
1.4. Product(s)	
2. Structure of the project	
2.1. Participants	
2.3 Executor	
2.4 Reporting arrangements	

The beneath example from the Flemish Government, Belgium, illustrates how many tasks of the inspectorate can be regarded as the operative part of a strategy²⁷.

²⁷ See also section 8.xxx on Projects.

Project P 729		Scanning of Large Oil Refineries	
Project Manager: FF			
Core Team: MB, JM, GP, LVG			
Necessity / Environmental relevance			
The five oil refineries in Antwerp Port are among the largest emitters of air polluting compounds in Flanders. They are also important players with regard to the impact in practically all other sectors of the environment. The size of the plant, the nature of the legislation and the way emissions are monitored (self-inspection with a mix of measurements and calculations) hamper enforcement of the applicable emission standards, thus requiring a separate approach compared to other types of plants.			
Description / Objective			
<ul style="list-style-type: none"> ▪ Integrated inspection of large oil refineries to be initiated in 2002 and continued in 2003 ▪ Examination and evaluation of the air pollution self-inspection methodology ▪ (Comparative) emission measurements in a number of facilities for the traditional parameters ▪ Dioxin emission measurements in some facilities ▪ (..... <i>shortened by editor</i>) 			
Success Criteria			
<ul style="list-style-type: none"> ▪ Emissions into air and water determined and assessed with reference to applicable limits ▪ Flares and fugitive emissions assessed ▪ Status report and action plan produced (air, waste, effluent) on the basis of examinations ▪ Internal/external processing of waste flows charted and assessed 			
Start date: 1 January 2002		Personnel requirement: 86 days	
Target date: 31 December 2003		Budget: EUR 65.900	
External preconditions			
Refinery training completed			
Not included in the project			
<ul style="list-style-type: none"> ▪ Further follow up of companies after any first warning notice ▪ Inspections in the framework of Seveso-II (Safety) 			

Roles and structure in project execution

Effective and efficient project work relies completely on the organisation established to carry out the project. Project organisations vary according to the type of project, budget, available resources etc., but some general considerations are accounted for below.

The *Project Owner* points out the direction of the project, follows the progress from a strategic perspective and has overall responsibility for the project outcome. The Project Owner distributes the mandate, legitimises the project and provides the necessary preconditions for successful accomplishment.

The *Steering Committee* should be able to manage the overall aspects of the project execution, contribute with professional competencies, and support and supervise the Project Manager.

The *Project Manager* has the responsibility for the daily accomplishment of the project. She/he manages and co-ordinates the work in the project group, communicates with internal and external stakeholders, reports to Steering Committee and/or Project Owner, and prepares necessary documentation on project progress and termination. The PM should have good leadership qualities, ability to cooperate, and social and communicative competencies. The necessity of other qualifications depends on the professional substance of the project.

In larger projects it is common to establish a *Project Group* to support the Project Manager with different professional skills. The PG members should actively

contribute to the progress of the project and possess professional as well as co-operative qualifications. The PM agrees with the respective PG members' managers on the terms for participating in the project.

8.9 Questions for reflection

The following questions are meant as an inspiring check list for the manager who considers putting more efforts into developing inspectorate systems.

- Does the inspectorate have the administrative systems that are needed to secure effective daily performance – considering the tasks of the inspectorate, staff competencies and job maturity, and inspectorate structure?
- Does the inspectorate have a quality system(s) that secures proper quality checks of important tasks according to external and internal rules and guidelines?
- Does the inspectorate have a proper system for handling data and documents?
- Does the inspectorate have shared and understood guidelines and regulations concerning compliance activities at enterprises (including resource allocation, inspection, compliance assessment and enforcement)?
- Does the inspectorate have a shared and understood system for rewarding the staff according to values and goals of the organisation?
- Are contracts or agreements elaborated describing goals, objectives, and outputs etc. of individual departments and units?
- Does the inspectorate have a system for effective communication with stakeholders, including the media?
- Does the inspectorate have project management policies and systems in place?
- Does the inspectorate have systems in place to share information and good practice with those that it regulates, other stakeholders and the public?
- Does the inspectorate provide a description of its services to those that it regulates, other stakeholders and the public?

9 MANAGEMENT OF THE PROJECT

This project was initiated by the Terms of Reference for the IMPEL Management Reference Book of Environmental Inspectorates discussed in depth in Cluster 1 meeting April 2001 and adopted by the IMPEL Plenary in Falun, Sweden, 19-21 June 2001.

Many Member States and the IMPEL secretariat have actively participated in this project, either by taking part in the working group (marked with **bold** in the table) or by providing inspiration and examples to the authors.

COUNTRY	NAME	ORGANISATION
Belgium	Paul Bernaert Peter Schryvers	Flemish Chief Inspectorate
Denmark	Gudmund Nielsen <i>Chairman of the WG</i> John Farr Ebbe Olesen Bo Rasmussen Søren Hjortsø Orla Johansen	Danish Environmental Protection Agency Copenhagen County, Department of Environment City of Copenhagen, Department of Environment East-Jutland Inspectorate Høje Taastrup Municipality, Department of Environment
Estonia	Aare Sirendi Tarvo Roose	Estonian State Inspectorate
France	Cecile Castel	Ministry of Environment
Germany	Gerd Hofmann Gisela Holzgraefe	Regierungspräsidium Darmstadt Abteilung Staatliches Umweltamt Hanau (Hessen)
Impel co-ordinator	Terry Shears Sabine Sommer	IMPEL Secretariat
Ireland	Iain Maclean	Environmental Protection Agency
Italy	Giuseppe Marella Nic Pacini	National Environment Agency
Latvia	Imants Kruminis Raimonds Vejonis	Latvian State Environmental Inspectorate Riga Environmental Board
The Netherlands	Pieter-Jan v. Zanten Albert Dam Paula van Teylingen	Overijssel Inspectorate

Norway	Ingegerd Aanonsen	Norwegian Pollution Control Authority
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Slovakia	Daniel Geisbacher Jamilla Durdovicova	Slovak Inspection of the Environment
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Sweden	Kia Regnér Secretary of the WG	Österåker Municipality, Department of Environment
	Ulrika Wahlström Thomas Forsberg	Västerås Municipality, Department of Environment
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	Mark Eggeling Willie Halcrow Dave Gorman James Curran Brian Roxburgh Nerina Holden Monica Straughan	Scottish Environment Protection Agency

IMPEL Reports – October 2003

When IMPEL projects are completed, a report is often produced. Reports are submitted to the IMPEL Meeting for adoption before they are published.

Adopted IMPEL Reports include (with date of adoption in brackets):

- IRI the Netherlands (May 2003)
- Best Practices concerning Training and Qualification for Environmental Inspectors (March 2003)
- Implementing Article 10 of the SEA Directive 2001/42/EC (February 2003)
- Finnish report on energy efficiency in environmental permits
- IMPEL Guidance Document on the Point VIII of the Recommendation of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections (Dec 2002)
- IRI Ireland (Dec 2002)
- IRI Belgium (Dec 2002)
- Finnish report on Energy Efficiency in Environmental Permits (Dec 2002)
- Finnish Comparison Programme II - Self-monitoring and electronic reporting, pulp and paper production (Dec 2002)
- Report on Lessons Learnt from accidents, Seminar held in Reims, 2001 (Dec 2002)
- IMPEL REVIEW INITIATIVE (IRI): Phase 3: Testing of the Review Scheme: 1st Review: Mannheim, Baden Württemberg, Germany, 15-19 October 2001 (Dec 2001)
- General Binding Rules (June 2001)
- Dutch Comparison Programme (June 2001)
- Integrated pollution control, compliance and enforcement of EU Environmental legislation to Industries (IPPC and non IPPC) of the food production/processing sector (June 2001)
- Best Practice in Compliance Monitoring (June 2001)
- IMPEL Review Initiative (IRI) Phase 2: Assessment and test of Questionnaire and Guidance (June 2001)
- Criminal Enforcement of Environmental Law in the European Union (Dec 2000)
- Report on Lessons Learnt from Accidents (Dec 2000)
- The Changes in Industrial Operations (Dec 2000)
- IMPEL Workshop on Integrated Permitting (Dec 2000)
- Finnish Comparison Programme (Dec 2000)
- Diffuse VOC Emissions (Dec 2000)
- IMPEL Workshop on the use of Chlorinated Hydrocarbons (CHC) in Industrial Plants (Dec 2000)
- IMPEL 2000 Conference on Compliance and Enforcement (Dec 2000)
- Report on the Interrelationship between IPPC, EIA and SEVESO Directives and EMAS Regulation (Dec 1998)
- IMPEL Reference Book for Environmental Inspection (Jun 1999)
- Report of a Workshop on Licensing and Enforcement Practices in a Cement Plant using Alternative Fuel (Dec 1998)
- Report on Lessons Learnt from Accidents (Dec 1999)
- Minimum Criteria for Inspections
 - General Principles (Jun 1998)
 - Frequency of Inspections (Dec 1998)
 - Operator Self-Monitoring (Dec 1998)
 - Planning and Reporting of Inspections (Jun 1999)
- Fact Sheet for Printers (May 2000)
- Complaint procedures and Access to Justice for citizens and NGOs in the field of the environment