

To:
Executive Committee
European Federation of Associations of
Environmental Professionals

Milano - Italy, April 6th 2011

Subject: AIAT comments to documents circulated from ExCo on April 5th 2011

Despite the very limited time we were given to read the above mentioned documents from the President and the Treasurer, as a new General Assembly will be held in only two days, our Association considers very important to share its views in advance with the ExCo and with all other member associations.

We think the following slogan can effectively summarize our general impression and suggest a clue to interpret our comments:

**More Information Less Frustration,
NO Lobby YES Network!**

It won't be possible for me to take part to the Frankfurt GA, but I wish you all a fruitful discussion.

Kind regards,

For **Associazione Ingegneri per l'Ambiente e il Territorio**
ing. Emanuele Regalini
President

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About the document

"President ENEP FUNDING AND FUTURE for discussion at the GA"

After 8 years of EFAEP activity and many meetings held with representatives of the Commission, we truly don't believe that our Federation should go on pursuing objectives related to lobbying, such as:

"- To effectively lobby 'Brussels': to improve environmental policies and legislation (one of our prime goals!) but also to generate an income stream. (It seems ludicrous that so many people think ENEP is a great concept – but that no one provides any financial help!)

- Setting up a lobbying strategy vis-à-vis EC and EP to give the results of Working Groups a policy impact;"

We state this for two reasons:

- on one side ENEP represents too many professionals with too diverse interests and competences and we have then experienced how difficult it can be to raise a common unique voice in favour or against new legislation proposals;
- on the other side the Commission already listens to voices coming from all sorts of stakeholders and has absolutely no need for another one; moreover, for monitoring implementation of directives the Commission already works with a wide network of National Environment Agencies and would then hardly profit from the support of a network of volunteering professionals.

In other words:

in order to develop a new and effective ENEP strategy we should refocus our goals, considering that:

- our individual members need networking and exchange much more than lobbying on Brussels;
- the need of member countries for information about EU legislation/activities is much stronger than the need of Brussels for information about countries (it is then a matter of the direction of information fluxes).

These two elements should be carefully kept in mind in the definition of new strategies.

About the document

"Treasurer Paper1 Funding options for discussion at the GA":

1. In this moment the proposal of rising the Brussels support (i.e. Coordinator + Project Officer) to full-time or more... looks really unjustifiable and I am sorry but we would really qualify it as "out of question": we would multiply by 5 times the fixed costs for the Federation (from 2 man-days to 10 man-days per week) without any guarantee of a proportional increase of incomes and benefits for members.
2. By the way, based on what we observed above about the first document and the need for refocusing our goals, we doubt that ENEP will ever really need such a centralized structural support in Brussels.
3. About the option of setting a 5€ fee, despite the fact that we certainly share the Treasurer's passion for Belgian beers... we find that the statement *"When you think that a beer in the Grande Place in Brussels can cost €5 the fee of €1 does seem extremely low for the type of service to which we aspire. We would have to present an increase in fees in terms of improved or potentially improved services to members."* looks really inappropriate if referred to ENEP activities; should any change in the fees been considered, this could only be based on a percentage of the actual fee paid by each professional to his/her national organization and not on a fixed amount; 5€ would represent the 12,5% of present AIAT annual fees but only the 3,3% of IEEM annual fees for full memberships: in general terms, we can foresee that the impact of such decision could then be much tougher for associations coming from Southern and Eastern European countries than for those coming from Northern countries.

About the document

"Treasurer Paper 2 Funding for the working groups for discussion at the GA"

We would like to highlight three main points:

1. in order to be considered valuable to ENEP, working-group should not simply "*start working enthusiastically*" but should produce real value to ENEP individual members, such as for example: spreading reports with summaries of national and European legislation or containing comparison of best practices, organizing seminars, etc.; in other words, as long as the WGs activities produce benefits only to a very restricted group of people (so far no more than 4-8 people per WG compared to around 40,000 individual members) 5000€ is already a huge amount of money (15% of ENEP budget to yield value to less than 0,1% of the individual members)!
2. Reimbursement by ENEP should then be considered reasonable only when such value is real and evident to all members; we am sorry to say that, so far, the only concrete feedback AIAT members have seen from the activities of WGs has been the chance to take part to the "EU verifier day" at a discounted rate. Considering the money we have been spending in the last few years for the EMS WG, we would have expected to see at least a public synthetic report about ISO activity on evolution of ISO 14000...
3. Refunding of travel expenses should really be very limited or totally avoided, as such expenses can be extremely high if compared to the added value they can yield; in my day-by-day working activity I have experienced how much teleconferencing can be more effective (and more **environmentally sustainable!**); there are nowadays some excellent and cheap online systems for teleconferencing at almost no cost (e.g.: GoToMeeting.com costs only 360 €/yr for an unlimited number of conf. calls with up to 15 participants).