
Environment and Climate Regional Accession Network (ECRAN)

IED/Chemicals WG
DRAFT Annual report
2013 - 2014

January 2014

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IED/Chemicals Working Group (Activity 2.8)

Introduction

In their third meeting, the Ministers of Environment of RENA countries agreed upon the following priorities to be covered in ECRAN (2013-2016) as the follow-up of the RENA programme (2010-2013):

- Building capacity for correct planning, transposition, implementation and enforcement of environmental/climate acquis;
- Assistance to the enlargement countries in the preparation of accession negotiations;
- Exchange of sharing experiences between candidates and /potential candidate countries and
- Support to enlargement countries in dealing with environmental and climate issues of transboundary importance.

As part of the ECRAN package of activities, also considering the health and environmental conditions in the region, the initiation of an IED/Chemicals Working Group within ECRAN is in line with the identified priorities and project TOR.

Chemicals are an essential component in our daily lives. At the same time, some chemicals can severely damage our health and ecosystems. Others could be dangerous if not properly used, treated or controlled as pollutants. Most of the ECRAN beneficiary countries are at a different level when it comes to transposition of the EC chemicals legislation and additional efforts are needed in the area of its implementation. The REACH and CLP regulations, interlinked amongst other with the Industrial Emissions Directive (IED), are covering major chapters of chemicals legislation and industrial pollution control. Progress in the beneficiary countries in implementing EU law in Industrial emissions sector and chemicals based on the EU progress reports is given in Annex I.

This agreed work plan covers the full period of ECRAN (i.e. October 2013 – October 2016). Under this work plan, the following specific tasks are to be implemented:

2.8.1 Organisation of the Annual meetings of the national coordinators of this Working Group

2.8.2 Capacity Building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED with:

- A Training Needs Analysis
- Organisation of regional training programmes (proposed a number of four 3-day programmes)

Beneficiaries

The beneficiaries are the Ministries of Environment of the beneficiary countries (Albania, Bosnia and Herzegovina, the former Yugoslav Republic of Macedonia, Kosovo^{*1}, Montenegro, Serbia and Turkey). In addition the other ministries and other bodies and institutions will need to be actively engaged in so far as their work is relevant for the scope of ECRAN.

¹ This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ opinion on the Kosovo declaration of independence.



Objectives

Overall objective

The overall objective is to strengthen regional cooperation between the EU candidate countries and potential candidates in the fields of environment and climate action and to assist them on their way towards the transposition and implementation of the EU environmental and climate policies and instruments which is a key precondition for EU accession.

Specific objectives

Within the scope of regional cooperation and assistance in transposition and implementation of EU environmental legislation, the specific objective of this Working Group is to improve the ability of ECRAN member countries to implement and enforce the EU environmental and climate acquis, specifically by providing assistance in strengthening the institutions and building capacity in complying with the EC Chemicals legislation. Emphasis will be placed on the REACH and CLP Regulations, interlinked with the Industrial Emissions Directive (IED) as these are covering major chapters in chemicals legislation and industrial pollution control

Results/outputs

The following result is expected for this activity:

- improved functioning of the environmental authorities and related authorities envisaged to be responsible for implementation of the REACH/CLP regulations and IED ;
- streamlined working methods and implementation of best practice in the region moving towards EU standards.

Task 2.8.1: Organisation of annual Working Group meetings

The 1st annual meeting took place in Skopje on 30 January 2014. The second is to be held on 10 February 2015 in Vienna.

No.	Date	Key outputs
1	30 January 2014	Annual Meeting of National Coordinators -NCs
2	10 February 2015	Annual Meeting of NCs
3	December 2015/January 2016	Annual Meeting of NCs

Task 2.8.2 Capacity building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED

In the REACH regulation, various stakeholders will have their specific roles, responsibilities and competences identified. The know-how regarding the hazards and potential risks of chemicals lays with the manufacturers and importers and with the national agencies/authorities. The so called “exposure scenarios” in the REACH system are the Conditions of use for specific chemicals.

REACH is complemented by the new Regulation for Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation, January 2009). This Regulation incorporates the classification criteria and labelling rules agreed at UN level, the so-called Globally Harmonised System of Classification and Labelling of



Chemicals (GHS). It is based on the principle that the same hazards should be described and labelled in the same way all around the world. Using internationally agreed classification criteria and labeling elements is expected to facilitate trade and to contribute towards global efforts to protect humans and the environment from hazardous effects of chemicals.

It should be noted that REACH and CLP are regulations and therefore directly applicable. As they enter into force, they will automatically form part of Member States' national laws. In order to enable REACH and CLP to operate effectively in practice, Member States are obliged to establish the necessary arrangements for their implementation. The Regulations have EEA relevance, i.e. they are binding also for Norway, Iceland and Lichtenstein. As the EEA agreement is allowing for free movement of goods, it is important that EEA countries have the same approach in enforcing REACH and CLP as Member States, thus ensuring level playing field for their industry and high level of protection for both man and environment.

Enforcement of REACH and CLP means, generally, a range of actions that national authorities initiate to verify the compliance of the duty holders with REACH and CLP Regulations. For example, this includes checking whether the substance has been registered or pre-registered or verifying the presence and correctness of the Safety Data Sheets.

The IED is the successor of the IPPC Directive and in essence, it is about minimising pollution from various industrial sources throughout the European Union. Operators of industrial installations operating activities covered by Annex I of the IED are required to obtain an integrated permit from the authorities in the EU countries. About 50.000 installations were covered by the IPPC Directive and the IED will cover some new activities which could mean the number of installations rising slightly.

An important synergy between REACH and the Industrial Emissions Directive is that information on the substance under the registration and authorisation procedures may be used to support the development of BAT reference documents. The risk assessment of substances under REACH that are manufactured or placed on the market in quantities of 10 tonnes or more per year comprises the complete life-cycle of the substance and therefore includes the use and manufacture of these substances in industrial installations covered by this Directive and options to avoid and control emissions. In this respect, Recitals (14) and (21) of REACH state that the information yielded on substances may also be used in risk management procedures under other EU legislation.

The implementation of the task included the following main steps:

Preparation of training needs assessment

The training (programme) has been preceded by a training needs assessment. A TNA Questionnaire has been prepared and distributed among the beneficiary countries in order to identify specific topics that have to be covered by the regional trainings, including downstream elements.

Based on earlier experience, possible training topics have been identified to be the following:

- General introduction on chemicals legislation (environmental/consumer/workplace including Biocides, POP's, import and export of dangerous chemicals, REACH/CLP linkages with amongst others mercury regulations, plant protection products legislation);
- Background and basics REACH and CLP (with roles and responsibilities under REACH);
- Specific obligations for authorities, methodologies and tools in risk assessment;
- REACH and CLP implementation details;
- Downstream consequences of REACH and interlinkage with other legislation (IED, SEVESO, Water Framework Directive, Waste);
- General introduction REACH/CLP in relation to IED;
- Selection of BAT (reference to methodology, BREFs and BAT Decision documents).



Compilation and elaboration of a training programme

The prioritised training needs have been elaborated in a training programme. Training targets have been developed for the prioritised training areas. They will function as the starting point for the organisation of the programme (incl. sequencing, determination of content of modules), selecting the target audience, organising logistics, deciding on to be used training methodologies, and on development of training materials.

The training programme has been decided to include up to four regional trainings. It is envisaged for each training to have a 3-day programme, including a site visit to a selected IED facility.

The training programme of this Working Group will have to be closely coordinated with the one designed for Activity 1.2 (ECENA WG) in order to avoid duplication and overlaps. The various modules with the main subjects are:

Module 1 General Introduction on chemicals, procedures of REACH/CLP and interlinkage with IED

Module 2 REACH specifics – procedures

Module 3 Technical aspects of REACH/CLP and IED

Module 4 REACH/CLP downstream consequences, interlinkages with IED and other legislation, accession issues

The target group for this training are government officials and experts from institutions in ECRAN beneficiary countries responsible for, or involved in environmental and (partly) chemical issues. In order to ensure optimal results, participation of representatives of the beneficiary countries will have to be continuous for all four modules.

Preparation of training manual

Based on the prepared and approved training programme, the project team has developed the training methodology that contains of general part covering the main training topics to be used for all trainings planned under this activity and topic specific parts that will be changed depending on the topic selected for specific training.

Training delivery

Planned regional trainings are being delivered in close coordination with the TAIEX Unit that will be responsible for provision of non-key experts and organisation of logistics (training venue, accommodation and transport of registered participants, etc.). The ECRAN Secretariat remains responsible for preparation of the lists of participants, provision of draft and final training agendas, preparation of ToR for identification of relevant EU MS experts, contribution to the process of EU MS expert's identification, while TAIEX Unit keeps the ultimate responsibility for implementation according to its mandate and procedures. The ECRAN Secretariat is responsible for the drafting, editing, printing and distribution of all training materials, handbooks, guidebooks or other required similar means of support. Delivered trainings will be evaluated in order to follow the level of reaching the training objectives.

Task 2.8.2 Results and Evaluation 2013-2014

The specific outputs under Task 2.8.2 for 2013-2014 were as required and have been summarised in the table below.

In summary: **Outputs under Task 2.8.2 (2013-2014)**



No.	Date	Key outputs
1	January 2014	Training Needs Questionnaire and Training Needs Assessment. Proposals for pilot industries to be visited. TNA report
2	February 2014	Training Methodology, Training Programme and Training Materials
3	Training Workshop no. 1. Montenegro May, 13-15, 2014	Training (1) ; General introduction chemicals and procedures REACH/CLP, IED (1) with a site visit to PROGAS in Hercec Novi, plant (IPPC/SEVESO lower tier) produces Acetylene based on the calcium carbide process Training report
4	Training Workshop no.2. Albania 2-4 December, 2014	Training (2). Procedures REACH/CLP (2), with a site visit to Bankers Petroleum Albania Ltd.(IPPC/SEVESO plant) oil extraction in Fier, Training Report

In the 1st Annual meeting of the national coordinators of the IED/Chemicals working group in Skopje on 30 January 2014, the training topics, general approach and the work plan have been discussed and agreed.

The participants from the beneficiary countries have suggested that it would be useful to include an introduction on other EU legislation (such as PIC, PPP and POPs) in the sessions. The Commission has pointed out that mercury regulations should also receive attention in the trainings.

Six out of seven countries which received TNA questionnaire have responded. Regarding the proposed subjects, the majority has rated these as high (scoring 1-2). Only a very small number has received a rating of 3 (low priority). Regarding the preferred methodology during training, workshop, discussions and experience sharing and case studies with site visits were most preferred. The various subjects to be handled in the training modules have been elaborated in the TNA report. This report and all other training reports, presentations and distributed materials have been placed on the ECRAN website (www.ecranetwork.org).

In the 3-day courses use was made of presentations and practical exercises. Materials that have been produced in IMPEL projects analysing the link between REACH and IED have been presented by the respective IMPEL expert. Next to explanatory presentations also round table discussions were held on the progress made in the field in the various Beneficiary countries. A summary based on the discussions in the first two training courses is given in the Table below. For the site visits the group of participants were divided into 3-4 groups with defined tasks to analyse the processes on the chemical and industrial pollution control aspects. Results have been presented in the training reports.

Exchange of experience took place by amongst others:

- ✓ presentations of various EU member countries and accession countries on inspection approaches and implementation of EU legislation
- ✓ presentations by the host country on the developments in IED implementation
- ✓ during the site visits in which problems and issues were discussed and reference was made to practices in other EU member and EU accession countries

Summary of Outputs from the round table discussions on the progress made in chemicals management and industrial pollution control in the beneficiary countries with specific reference to implementation of EU Law.



Country	General findings
Montenegro	<p>The main problem is that there is no inventory/register on chemicals at national level.</p> <ul style="list-style-type: none"> - REACH has been adopted in the national chemical law and restrictions have been translated; - Screening report of the acquis was sent to the Commission; - A inventory/register of chemicals will be developed under the IPA project for the substances that are imported in quantities of more than 100 kg per year; - No poisoning center in place; - No chemical production and only chemical import; - No Helpdesk yet and AARHUS center is used; - Chemicals are under Ministry of Spatial Planning and Environment; - No formal cooperation between the ministries; - Penalties are included in the national law.
Turkey	<p>The main difficulty is the Safety Data Sheet (SDS) and related communication.</p> <ul style="list-style-type: none"> - Legislation aiming at alignment with REACH and CLP has been drafted in 2013; - Chemicals inventory is in place but there are difficulties with data processing due to lack of staff; - Competent authority has been set up; - Ministry of Environment and Urbanisation (MoEU)-Ministry of Transport, Maritime Affairs and communications (MoTMC)-Ministry of Health (MoH) set up a website; - Helpdesk is taken over by the Ministry from IMMIB; - No poisoning center established; - Penalties are included in the national law; - IPPC legislation in place, companies under control.
Albania	<p>No chemical inventory/register is available and there are difficulties on inter-ministerial cooperation.</p> <ul style="list-style-type: none"> - There is a law on chemicals dating from 2003;



Country	General findings
	<ul style="list-style-type: none"> - Ministry of Environment (MoE) has been drafting new law to implement REACH and CLP. It is expected to be approved in 2014; - No inventory/register for chemicals; - Penalties and helpdesk will be included in the new law; - The responsibility of each ministry will be defined in the new law.
FYR of Macedonia	<p>Lacking of human resource is one of the problems.</p> <ul style="list-style-type: none"> - No production of chemicals, only import; - New law on chemicals from November 2010; - Preparing rulebooks and list of chemicals; - Has intersectoral body consisting of 11 institutes and industry; - Helpdesk was set up in 2011 and it is now out of order; - National poisoning center needs to be established according to the new chemical law;. - Has a system to control transportation and import of chemicals (custom administration). - Macedonia has an inventory for licensed chemicals companies.
Serbia	<p>Lacking of capacity to process and evaluate the information/data from industry is the main problem.</p> <ul style="list-style-type: none"> - The new law on chemicals translating REACH and CLP from 2009 which accepts the definition of REACH and CLP; - National chemical register has been established for the chemicals over 100 kg per year. Companies are sending the information every year. Register built based on Swedish model with help of SIDA; - Has Helpdesk and national poisoning center; - Information on chemicals is used and partly shared with the poisoning center (non-confidential information).
Kosovo	<p>Kosovo is facing the problems of having no chemical inventory/register and lacking human resource.</p>



Country	General findings
	<ul style="list-style-type: none"> - No chemical production and only import; - Has chemicals law from 2007 and new chemical law in 2014; - Adopted an administrative instruction on risk assessment (Ministry of Health); - Ministry of Environment is the coordinatory body; - No chemical register and national poisoning center; - A new law which transposing PIC is planned in 2014.
Bosnia and Herzegovina	There is a register for chemicals including data from Safety Data Sheets (SDSs).

During each course an introductory round was held among the participants with the question on the years of experience one has in the field of environment, chemicals (REACH/CLP) and IPPC/IED. The results showed that most of participants have limited knowledge and experience on chemicals (REACH/CLP). The level of experience in the group was very different. This is a challenge for trainers and participants as well. Following the first training in the series, Albania asked for TAIEX assistance in preparing their chemicals legislation. In the second training, countries learned from each other and for example on the inventory and registers of chemicals in the accession countries, it is expected that additional TAIEX assistance will be needed and requested.

	Years of experience					
	0 – 1 year		1 – 5 years		5 – 10 years	
	C1.Mont.	C2.Alb.	C1.Mont.	C2.Alb.	C1.Mont.	C2.Alb.
Environment	4	4	9	3	7	4
Chemicals (REACH/CLP)	7	7	10	2	1	
IPPC/IED	11		3		4	1
Others						1

All trainees indicated that their expectations for the workshop were met. Most of the trainees indicated that the training was of a high quality and useful. The preparation and knowledge of the trainers were appreciated. The trainees also expressed their wish to have more concrete knowledge on (eco)toxicology in the following trainings. Some participating countries raised the problems that they have such as lacking of

knowledge and low capacity regarding implementation of REACH and CLP Regulations. The trainers promoted the participating countries to use the TAIEX facility in case further assistance is needed on a national scale. This can be facilitated via the ECRAN secretariat. A good example was that via ECRAN Albania has asked



TAIEX's assistance for REACH and CLP related issues, and subsequently could implement it on a national scale. The TAIEX expert mission now will provide assistance to the Albanian Ministry of Environment on the compliance checking of the following draft legislation prepared:

1. Framework law on chemicals legislation
2. Classification, packaging and labeling of substances and chemical mixtures (CLP);
3. Import and export of hazardous substances;
4. Approval of substances and chemicals, manufacture, placing on the market and use of which is restricted or prohibited (Annex XVII of REACH);
5. List of hazardous substances which by their nature pose a serious risk to life, human health and the environment (Annex XIV of REACH).

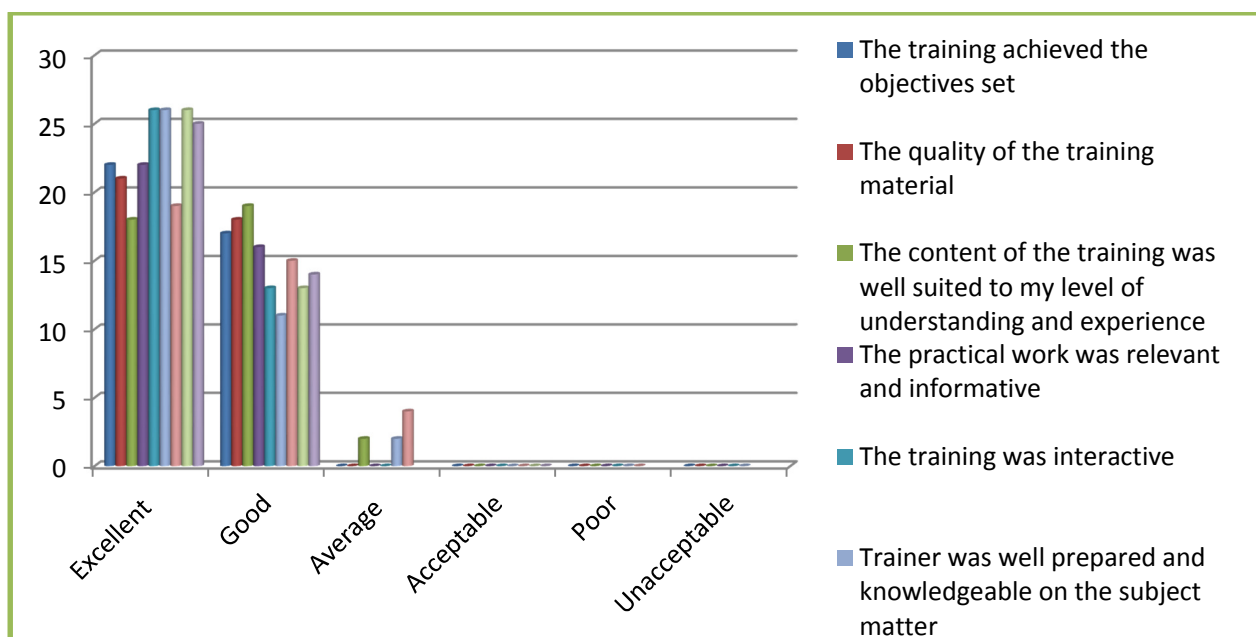


Figure 1. Summary of the evaluations of the first two training courses under Task 2.8.2

Task 2.8.2 Outlook and Challenges for 2015-2016

The required outputs under Task 2.8.2 for the coming period 2015-2016 has been summarised below.

In summary: Required **Outputs under Task 2.8.2 for 2015-2016**

No.	Date	Key outputs
5	Training Workshop no 3: 9, 10 and 11 June 2015	Training(3). Technical aspects REACH /CLP, IED. Training Report Skopje, FYR of Macedonia
6	Training Workshop no.4. December 2015	Training (4). REACH/CLP downstream consequences, interlinkages with IED and other legislation; accession issues.. Training Report

Considering the positive evaluation of the training courses up to now, the courses will be continued with the present set-up covering the elements of the package that have been decided upon. Taking into consideration



that some of the subjects are handled in a consecutive way in the series of training courses, it is of importance to select as much as possible the same persons to participate in the training courses. It was noticed that this was not always possible for the beneficiary countries due to the ongoing duties and tasks of selected training participants.

The third training workshop will be held in Macedonia (9-11 June 2015). The envisaged programme elements include: exposure scenarios; PBT and VPVB assessments, Environmental Risk Assessment; human health risk assessment; classification of chemicals with endpoints and testing; REACH IT and IUCLID Applications; REACH/IED practical cases; site visit/common inspection of a selected IPPC/SEVESO Installation.

Concluding remarks

The defined activities for 2014 have been carried according to plan. Based on the findings a slightly adapted time schedule for implementation in 2015 has been made (ANNEX II)

Compared with earlier activities under RENA, the chemicals legislation is receiving now more attention and has been included in ECRAN as a subject in combination with the IED. The importance of the subject is also reflected in the work programme of IMPEL, the network for environmental inspectors in EU member states. Within IMPEL the interlinkages between REACH and IED are being analysed. IMPEL has been one of networks we have cooperated with. By inviting experts involved in IMPEL and also those involved in ECHA (European Chemicals Agency) in our trainings it was possible to share, explain and train in the various new tools and guidance products provided by these organisations. As indicated, the results showed that most of participants have limited knowledge and experience on chemicals (REACH/CLP) and that the level of experience in the group was very different. This outcome will be taken into consideration in developing the programmes of the courses in 2015. The provision of more basic background and exercises might be an appropriate approach in this respect.

To keep the link with practices in the field we have followed the approach to combine our activities with site visits. For this purpose the contribution of the WG national coordinators was most valuable as contacting and organizing site visits required an active involvement and approach. The combination of ECRAN with the TAIEX facility opened up additional opportunities, i.e. to organize trainings/assistance in specific areas on a national scale. Although use has already been made of this possibility (ref. Albania), more initiatives might be taken in this respect.



Annex I Progress of the beneficiaries in adopting and implementing EU Law in industrial emission sectors and chemicals in 2013/2014²

Albania

As regard industrial pollution control and risk management, Albania ratified in September 2012 the Protocol on Preparedness, Response and Cooperation to Pollution Incidents by Hazardous and Noxious Substances (OPRC-HNS). The law transposing the EU Directive on the control of major-accident hazards (the 'Seveso II' Directive) has not yet been adopted. Effective checks to reduce the discharge of pollutants from industrial plants are not yet in place. Self-monitoring by industries is rarely enforced. A framework law on chemicals management aiming at bringing Albania in line with the EU acquis and at regulating the import and export of chemical substances is awaiting adoption.

Bosnia and Herzegovina

In the field of industrial pollution control, Bosnia and Herzegovina ratified the Convention on Transboundary Effects of Industrial Accidents. . In the field of chemicals, Republika Srpska adopted implementing legislation advancing the alignment with the EU Regulation on classification, labelling and packaging of substances and mixtures (CLP) and implementing legislation on biocides. The European Chemicals Agency carried out a successful first mission to Bosnia and Herzegovina in 2013.

Kosovo

Kosovo adopted industrial pollution prevention control guidelines. It also adopted a set of administrative instructions on the form and content of an application for an integrated permit and on procedures for the development and approval of Best Available Techniques.

The new administrative instruction on cadastre of environmental pollutants was adopted in 2013, marking modest progress in the area of industrial pollution and risk management. Only one permit has been issued, for the main cement plant. Regarding chemicals, Kosovo adopted an administrative instruction on risk assessment. A law on chemicals was adopted.

Montenegro

In Montenegro, there were some developments in the area of industrial pollution control and risk management. During the reporting period, the first IPPC licences were issued for the landfills 'Livada' in March, 'Mozura' in April and 'Progas Niksic'. In the field of chemicals, the implementing legislation on classification, labelling and packaging of chemicals and the legislation on details of contents and method of keeping the list of classified chemicals was adopted. The government adopted the national implementation plan for the Stockholm Convention for 2014-2020. A strategic plan in the field of chemicals needs to be developed.

Serbia

In the field of industrial pollution and risk management of Serbia, 162 out of an estimated 185 integrated pollution prevention and control (IPPC) installations have submitted their requests for integrated permits. Ten permits have so far been issued compared to six in the previous reporting period (i.e. 2012 -2013). The capacity constraints of the competent department in the Ministry of Agriculture and Environmental Protection and the applicants' limited knowledge, in spite of training, explain slow progress in issuing permits.

² EC DG Enlargement Strategy and progress reports 2013 and 2014

http://ec.europa.eu/enlargement/countries/strategy-and-progress-report/index_en.htm



Linkages between environmental impact assessments and IPPC need to be strengthened and their synergies exploited. Capacity at central and local level for issuing IPPC permits is insufficient. Intra- and interinstitutional cooperation needs to be established. Minimum standards for assuming statutory duties at local level are yet to be ensured before competencies are devolved. The public participation foreseen in the integrated permitting process needs to be significantly enhanced. In 2012, 197 operators in total reported their data to the Serbian pollutant release and transfer register, according to the European Regulation on Pollutant Release and Transfer thresholds (of 270 with a reporting obligation). Reports are mainly lacking from agricultural and mining operators. Capacity constraints also hamper progress in implementing the legislation on prevention of chemicals accidents.

As regards chemicals management, the Law on Amendments to the Law on Prohibition of the Chemical Weapons and on their Destruction was adopted in November 2013. The newly formed department in the Ministry of Agriculture and Environmental Protection has taken over all the functions of the Chemicals Agency, which has closed. However, technical posts have been reduced by 30 %. Further strengthening of administrative capacity is therefore necessary, especially in the field of risk assessment of biocidal products. Clear and non-overlapping responsibilities for chemicals inspection remain to be assigned.

FYR of Macedonia

With regard to industrial pollution control and risk management, work in Macedonia on alignment with and implementation of Seveso II Directive is progressing, with amendments to the Environmental Law. Implementing legislation was adopted to bring national legislation on industrial pollution control and risk management into line with the Seveso II Directive. The procedures for integrated pollution prevention and monitoring are ongoing, but are well behind schedule. The requirements for public consultation with stakeholders are still not properly applied.

In the area of chemicals, implementation of the Registration, Evaluation, Authorisation and Restrictions of Chemicals (REACH) Regulation progressed. Administrative capacity remains insufficient.

Turkey.

In Turkey, as regards industrial pollution control and risk management, EU technical assistance for the implementation of Industrial Emissions Directive and the Seveso II Directive are provided. Legislation implementing the Industrial Emissions Directive needs to be adopted. An implementing law on preventing and mitigating the effects of large industrial accidents, aiming to increase alignment with the 'Seveso II' Directive, was adopted in December 2013.

As regards chemicals, legislation needs to be adopted to implement the Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals. A law on classification, labelling and packaging of substances and mixtures, aiming to increase alignment with the acquis, was adopted.



ANNEX II: DRAFT Schedule of Tasks in ACTIVITY 2.8

	2014												2015												2016											
Tasks	j	f	m	a	m	j	j	a	s	o	n	d	j	f	m	a	m	j	j	a	s	o	n	d	j	f	m	a	m	j	j	a				
1. Annual Working Group meetings																																				
2. Capacity Building																																				
Training Needs Analysis																																				
Training Programme and materials																																				
Delivery Training 1																																				
Delivery Training 2																																				
Delivery Training 3																																				
Delivery Training 4																																				