

Enforcement and compliance (ECENA) Working Group

Activity 1.2

Task 1: Capacity building on compliance with environmental legislation

Coordinator ECRAN KE 2

Ike van der Putte



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Specific objective task 1.2.1

To design and implement the **practical capacity building** component for **inspectors and permit writers** in relation to the implementing obligations of the community environmental and climate legislation (particularly the new ones).

The trainings are to be designed as a **cross cutting activity**, in such a manner that the training programme will allow participation of policy makers and legal drafters from other relevant WGs members such as Waste, Air, Water, etc.



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In summary: Outputs under Task 1.2.1 for 2014
 Environment and Climate
 Regional Accession Network **ECRAN**

No.	Date	Key outputs
1	January 2014	Training Needs Questionnaire and Training Needs Assessment. Proposals for pilot industries for common inspection. TNA report
2	February 2014	Training Methodology, Training Programme and Training Materials
3	Training Workshop 1, May 20-22, 2014	Training IED, selected directives, common inspection with cross-cutting IED/ambient water quality legislation (1) Training Report (Zagreb, Croatia, Al melting and casting)
4	Training Workshop 2, September 10-12, 2014	Training IED, selected directives, common inspection with cross-cutting IED/ambient water quality legislation (2). Training Report (Skopje, Macedonia, brewery)
5	Training Workshop 3, November 18-20, 2014	Training IED, selected directives, common inspection with cross-cutting IED/ambient water quality legislation (3). Training Report (Istanbul, Turkey, textile industry)



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In summary: Outputs under Task 1.2.1 for 2015

No.	Date	Key outputs
1	21 – 23 April 2015	4th regional training on compliance with environmental legislation with site visit to IPPC installation (Thermal Power Plant Pljevlja), Kolasin and Pljevlja, Montenegro. Special presentation: Energy Community on LCPs.
2	08 – 10 September 2015	5th regional training on compliance with environmental legislation with site visit to IPPC installation (Bankers Petroleum Factory), Tirana and Fier, Albania.
3	17 -19 November 2015	6th regional training on compliance with environmental legislation with site visit to IPPC installation (Metal industry, Arcelor Mittal), Sarajevo and Zenica, Bosnia and Herzegovina.



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TNA – Questionnaire

- Permit issuing/Inspection Management
(integrated permits; inspection planning -----)
- IED/SEVESO subjects & related regulations -----
- IED installation to be visited-----
- IED interlinkages with ambient environment and other legislation
(Water, air, nature, waste etc.)-----=



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Based on earlier experience, a possible training set-up and topics could be the following (adapted according to the outcomes of the TNA):

Day 1 Mainly related to general subjects with inspection management, the regulatory cycle and inspection and permitting functions with IPPC/IED requirements also in relation to Ambient environmental quality (***cross links*** with WFD, Air quality, Nature , Waste etc.). Special subjects and specific subjects have to be selected for specific attention including IED/IPPC with EIA, LCP, PRTR, SEVESO II/III, VOCs, waste and chemical management

Day 2; Preparation for the (industrial) site visit with BAT and BREF evaluation of the selected industrial site to be visited; exchange of experience from the various countries in the region considering the selected type of industry.
Presentation on the selected factory site backgrounds.
Preparation of checklists for the site visit.

Day 3 on site visit/common inspection of a specific industry and reporting.

The target group for this training are **inspectors and permit writers** from the beneficiary countries around a maximum number of 30.

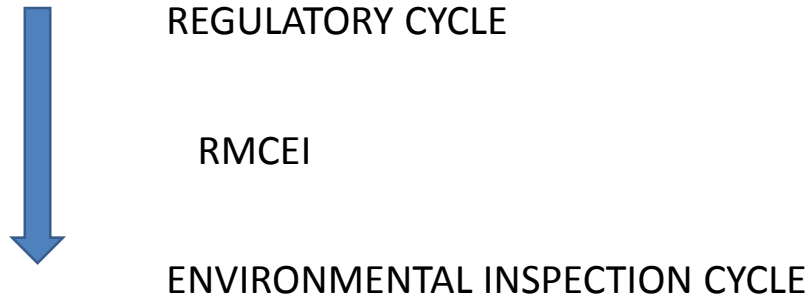


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DAY 1: Inspection Management

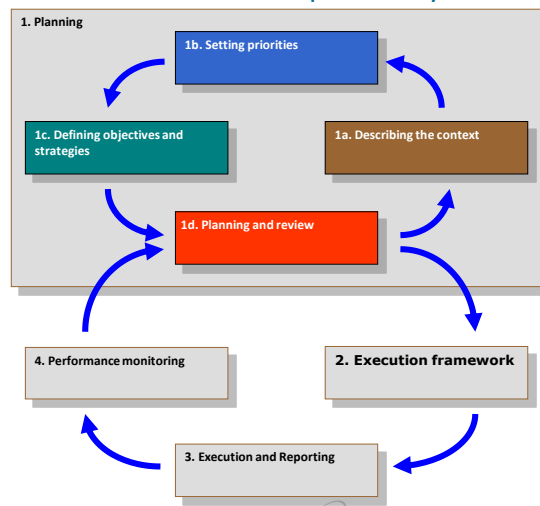


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Environmental inspection cycle



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IED Inspection/Permitting

Environmental Inspections

What do we have to do?

What do we regard as most
important?What do we want to achieve,
how and when?

Ref.: IMPEL Guidance for the implementation of the IED in planning and execution of inspections



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Other subjects:

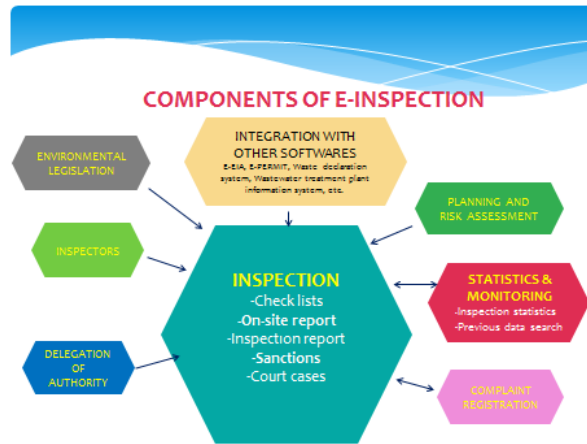
- IRAM application
- Routine/non-routine inspections
- Experience of host country in inspection management and IED inspection
- Special subjects (SEVESO: Safety report; hazard/risk assessment)
- New elements in IED (soil and groundwater baseline report)
- Interaction of IED with other legislation (IED/Nature; IED/Water; IED/REACH)



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- Experience of host country in inspection management and IED inspection; Example Turkey

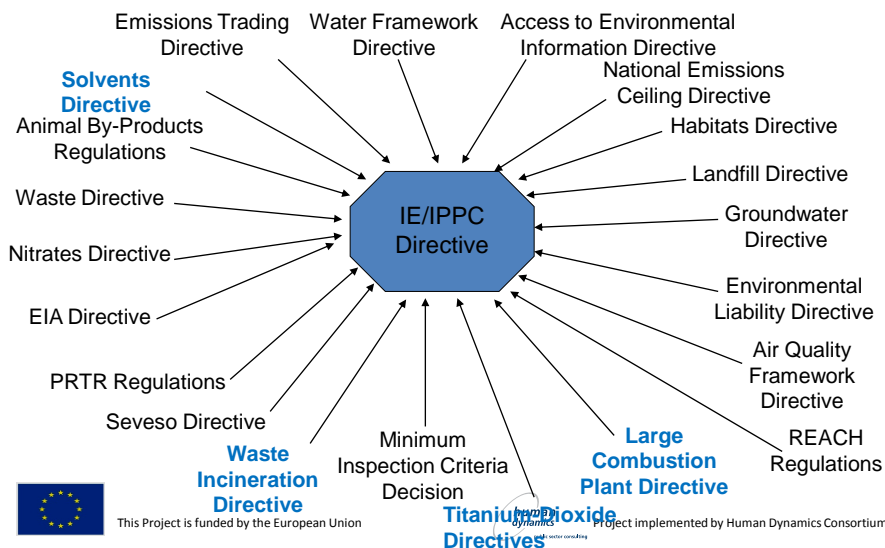


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IED/IPPC: Range of Potential Interactions with Some other Community Legislation

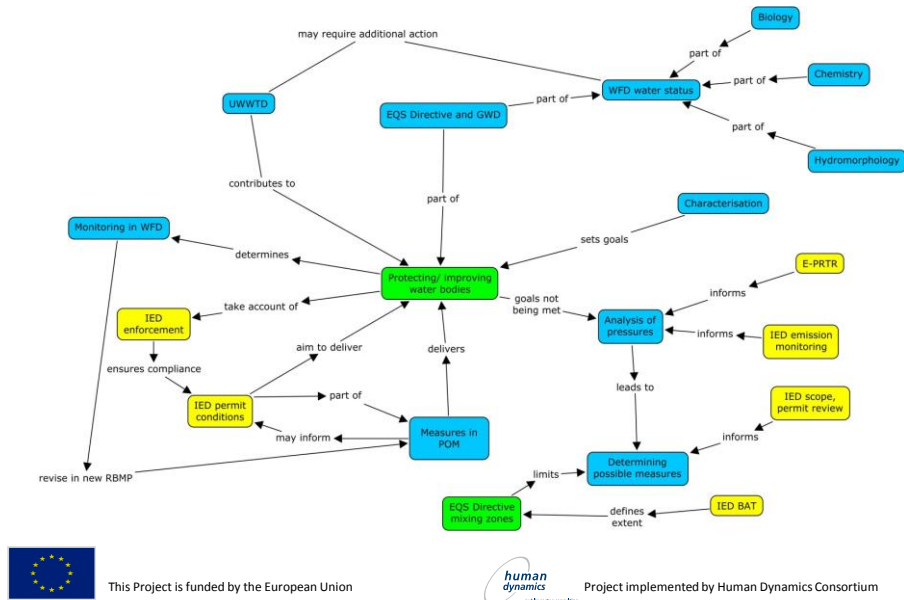


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Interaction between EU law relating to industrial pollution control and water management

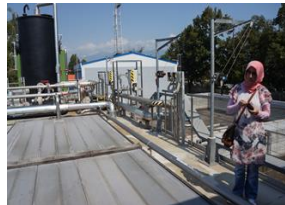


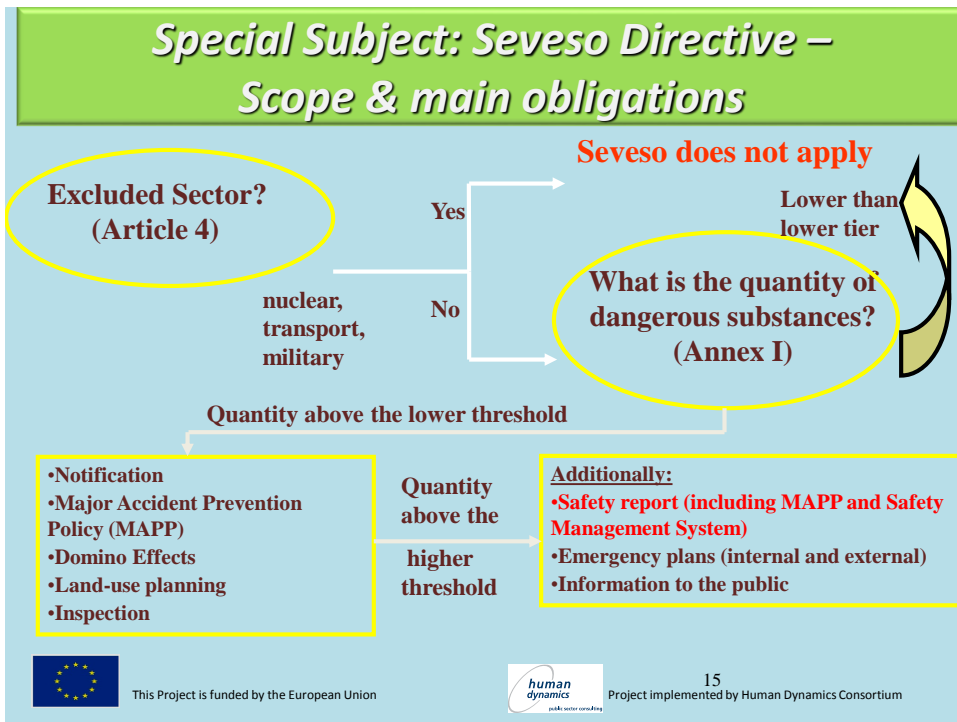
Day 2: Special subjects, BAT selection, preparation site visit

presentation of factory/comparisons with BAT

Day 3: Site visit/common inspection

sub-groups (3-4) with specific tasks/questions/checklists





Reference Materials/Manual include ao:

BAT/BREF docs and BAT decision docs;
IMPEL reports/guidance documents:

- Linking the Water Framework Directive and IED Directive (IMPEL 2013)
- Inspection Guidance book for landfill inspections (IMPEL 2012)
- Guidance for the implementation of the IED in planning and execution of inspections (IMPEL 2013)
- The implementation of the Environmental Impact Assessment on the basis of precise examples (IMPEL 2012)
- Setting inspection targets and performance monitoring (IMPEL 2012)
- Comparison Programme Implementation Air Quality standards and industrial air emissions (IMPEL 2012)
- Linking the Directive on Industrial Emissions (IED) and the REACH regulation (IMPEL 2013, draft)
- Easy TOOLS Risk Assessment Guidance Book (IMPEL 2012)

PARTICIPANTS AND EXPERIENCE LEVEL 2014

	Years of experience								
	1 – 5 years			5 – 10 years			More than 10 years		
	Cro	Mac	Tk	Cro	Mac	Tk	Cro	Mac	Tk
Inspectors	4	7	10	5	5	10	7	7	10
Permit writers	1	1	5	4	5		1	1	
Policy makers/others	1	2		1		1	1	3	2

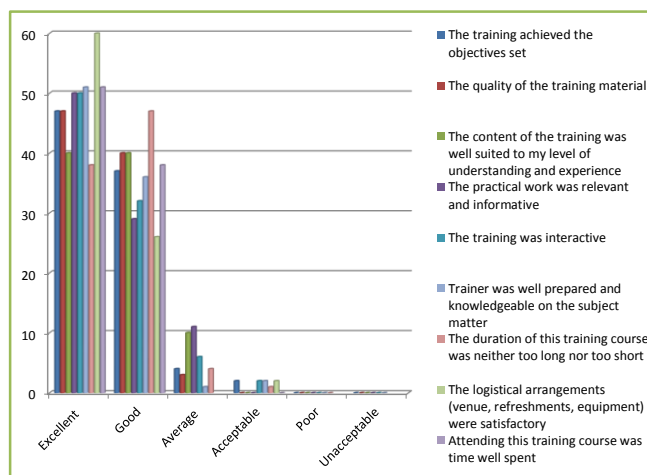
- 1) Experience level very diverse
- 2) The mixture permit writers/inspectors was appreciated very much
- 3) Not always possible to have the same participants in every course



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EVALUATION RESULTS 2014

Suggestions in follow –up: continue with the set-up; more focus on the sector that is visited; more presentations on the progress of implementation of environmental legislation in the countries



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PARTICIPANTS AND EXPERIENCE LEVEL 2015

	Years of experience								
	1 – 5 years			5 – 10 years			More than 10 years		
	Mn	Alb	BiH	Mn	Alb	BiH	Mn	Alb	BiH
Inspectors	9	1	5	4	3	7	9	13	8
Permit writers		4	3	3	2	2	2	1	
Policy makers/others	1	1		1		1		4	1

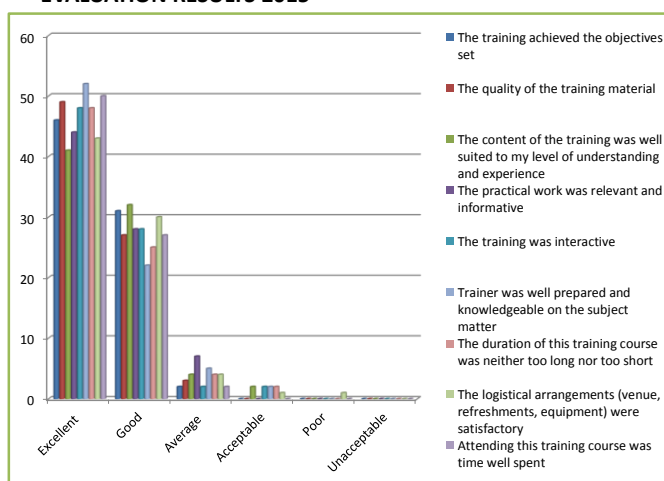
1. Practice appreciated by inspectors
2. For permit writer very helpful. With cooperation between permit writer and inspector higher quality permits can be issued
3. Structure of the course with site visits should be kept



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EVALUATION RESULTS 2015

Suggestions in follow –up: continue with the set-up; more focus on the sector that is visited; more presentations on IRAM, IED monitoring and reporting and waste



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Task 1.2.1 Outlook and Challenges for 2016
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No.	Date	Key outputs
1	Training Workshop 7, April 12 - 14, 2016	Training IED, selected directives, common inspection with cross-cutting IED/waste legislation (7). Training Report (Serbia PANCEVO oil refinery)
2	Training Workshop 8, June 14 - 16, 2016	Training IED, selected directives, common inspection with cross-cutting IED/waste legislation (8). Training Report. (Kosovo, Ferro Nickel industry)

Originally it has been decided to organize a total of up to eight regional trainings allowing that each beneficiary country will have the opportunity to host at least one regional training.

It is recommended to proceed with this approach as far as possible



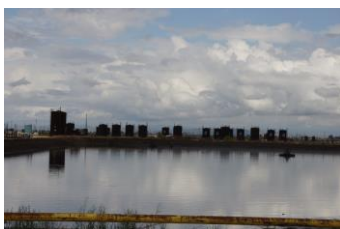
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Thank you for your attention



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