

TAIEX-ECRAN
Capacity Building Workshop on the
Integrated Risk Assessment Method/Easy Tools



Content

- **Environmental Protection Inspection (EPI)**
- **Legal base – IED**
- **Coordinated inspections in Croatia**
- **Current practice - inspection planning**
- **Outputs of TWL IPA 2011 Project „Capacity building of the environmental inspection and other relevant authorities and institutions for preventing, recognizing, investigating and prosecuting offences against environment”**

EPI

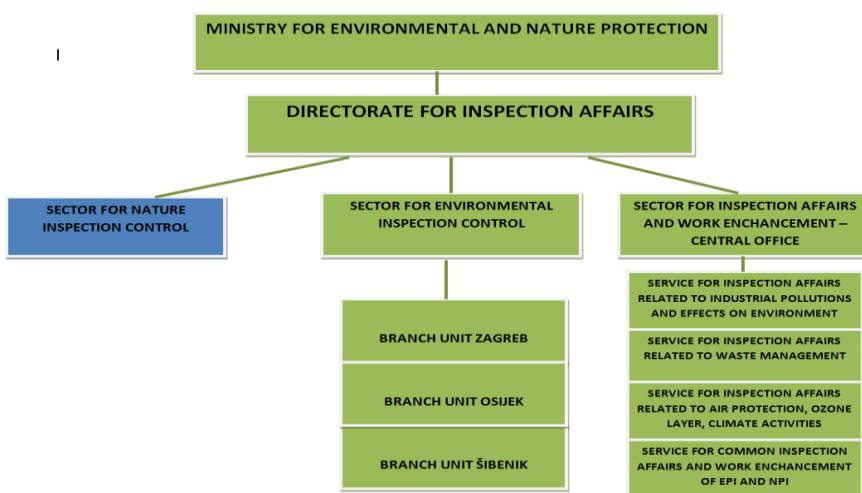
- **Ministry for Environmental and Nature Protection (MENP) – central authority for implementing environmental management and protection policy in Croatia (coordinating role)**
- **75 inspectors are operating through the Central Office in Zagreb (Coordinator for IRAM) and 20 Offices organized in 3 Branch Units**
- **EPI competences: control of EP conditions, EIA, air emissions and air quality, waste management, environmental accidents, sea water quality, TFS, SEVESO, ODS, light protection, remediation of environmental damage...**

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EPI organigram



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Legal base

- Directive 2010/75/EU of the European Parliament and the Council on industrial emissions (the Industrial Emissions Directive or IED) from 24 November 2010 for the first time introduce obligatory provisions related to „system of environmental inspections of installations” - Art. 23
- IED is mostly transposed in Croatia Environmental Protection Act (EPA) (Official Gazette 80/13, 78/15) and Regulation on environmental permit (Official Gazette 8/14)
- Legal basis for coordinated inspection according to Art. 224 (3) of EPA
- Legal basis for inspection planning according to Art. 227 of EPA

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Legal base IED Art. 23 - point 3

3. Each environmental inspection plan shall include the following:
- (a) a general assessment of relevant significant environmental issues;
 - (b) the geographical area covered by the inspection plan;
 - (c) a register of the installations covered by the plan;
 - (d) procedures for drawing up programmes for routine environmental inspections pursuant to paragraph 4;
 - (e) procedures for non-routine environmental inspections pursuant to paragraph 5;
 - (f) where necessary, provisions on the cooperation between different inspection authorities.



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Legal base IED Art. 23 - point 4

4. Based on the inspection plans, the competent authority shall regularly draw up programmes for routine environmental inspections, including the frequency of site visits for different types of installations

The period between two site visits shall be based on a systematic appraisal of the environmental risks of the installations concerned and shall not exceed 1 year for installations posing the highest risks and 3 years for installations posing the lowest risks.

If an inspection has identified an important case of non-compliance with the permit conditions, an additional site visit shall be carried out within 6 months of that inspection.



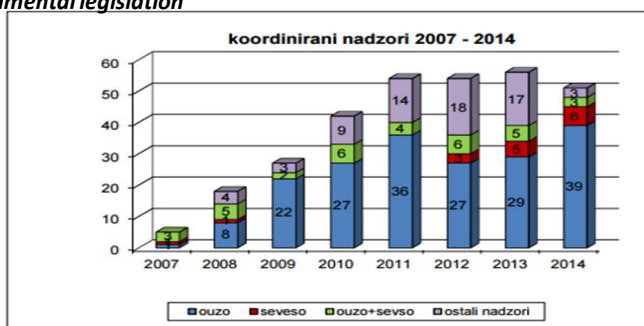
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Coordinated inspections

- Coordinated inspections since 2007 according to *Agreement on cooperation between inspection services* – installations with significant environmental impact (Annex I IED, SEVESO, both IED & SEVESO, others)
- Manual for inspection control of IPPC installations - Phare 2005 project *Enhancement of environmental protection inspection for enforcement of new environmental legislation*



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Coordinated inspections

- take into account the whole environmental performance of the installation, covering emissions to air, water and land, generation of waste, use of raw materials, odours, noise, prevention of accidents, transboundary impacts, restoration of the site upon closure
- involve line inspections due to their competences for different components of environment



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Inspection planning

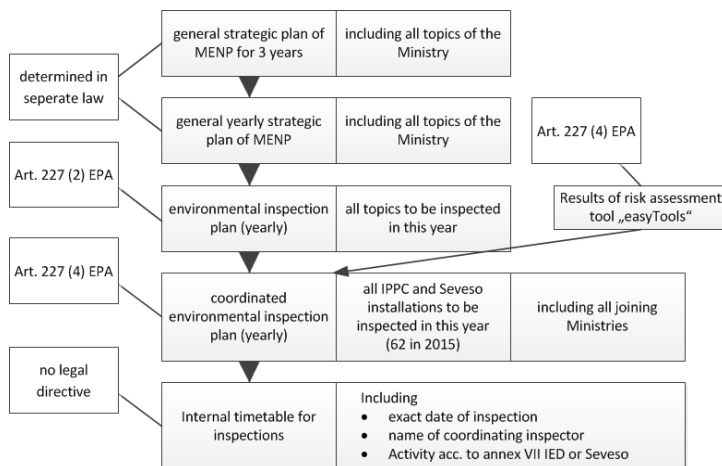
- **NOT** - environmental inspectors as firefighters
- **YES – prioritization – planning**
- Recommendation of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections in the Member States (2001/331/EC)

In order to make system of inspections efficient, Member States should ensure that environmental inspections activities are planned in advance.

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Inspection planning



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Inspection planning

General 3 years strategic Ministry working plan – public available:

http://mzoip.hr/doc/strateski_plan_ministarstva_zastite_okolisa_i_prirode_za_razdoblje_2014-2016_1.pdf

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Inspection planning – ANNUAL MWP

ENVIRONMENTAL PROTECTION INSPECTION							
No	SPECIFIC OBJECTIVE	ACTIVITY	INDICATOR	RESPONSIBLE UNIT	DEADLINE	REFERENCE TO STRATEGIC DOCUMENT	TYPE OF ACTIVITY
	<i>What do we want to achieve?</i>	<i>Which activities should be taken?</i>	<i>Quantified activity</i>	<i>Who is responsible?</i>	<i>Date for closing activity</i>	<i>Referred Document title</i>	<i>I-inspection control</i>
A	B	C	D	E	F	G	H
3.	Inspection performing	1)Coordinated inspection 63 2)Landfills inspection – remediation and activities based on State Fire protection Action Program 300 3)Inspection of Local Authorities and Municipal Services according Regulation on Municipal Waste 4) Inspection of authorized persons for waste management and inspection of EEE sellers 5)Inspection of Local Authorities - control of provisions of Waste Management Act 6) TFS control 7)Inspection of ODS – Halons 8)Inspection of Military objects 9)Participating in Misdemeanors Courts 10)Control Inspections	Minutes	Sector for Inspectional Affairs and Work Improvements Sector for Environmental Inspections	1) 3) 15.12.2015. 2) 30.6.2015. 4) 5) 6) 7) 8) 30.11.2015. 9) 10) when appropriate	Strategic plan of MENP	I

Public available - <http://www.mzoip.hr/hr/ministarstvo/strategije-planovi-i-ostali-dokumenti.html>

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Inspection planning - IAWP

2015 INSPECTION ANNUAL WORK PLAN			
I Quarter	II Quarter	III Quarter	IV Quarter
Coordinated inspection Coordinator of coordinating inspections: Ante Belamarić			
Inspection of authorized persons for waste management Coordinator: Natalija Vrdoljak			
Inspection of Local Authorities - control of provisions of Waste Management Act Coordinator: Renata Miletic			
TFS control Coordinator: Vlasta Pašalić			
Landfills inspection – remediation and activities based on State Fire protection Action Program Coordinator: Ivan Pušić			
	Inspection of ODS – Halons Coordinator: Diana Rački		
	Inspection of Local Authorities and Municipal Services according Regulation on Municipal Waste Pending Regulation		
	Inspection of Military objects Coordinator: Ante Belamarić		
Inspection of EEE sellers Coordinator: Branimir Fuk			
Implementation of TWL IPA 2011 Project „Capacity building of the environmental inspection and other relevant authorities and institutions for preventing, recognizing, investigating and prosecuting offences against environment“			
Cooperation and participation in International Networks and Institutions (IMPEL, RENA, THEMIS, INECE, INTERPOL, TWG 2 for SEVESO II ect.).			
Cooperation with other state institutions.			
Planning and reporting, non-routine inspections, control inspections and other from EPI competences			

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Inspection planning 1– Installations

- Central Croatian body for collecting and keeping data and databases:



- Number of issued permits/IED Installations – currently 178 (approx. 40-50 requests?)

Service for Environmental Permitting and Risk Installation within MENP

- Environmental Permit - <http://mzoip.hr/hr/okolis/okolisna-dozvola.html>

- Number of SEVESO installations - 25 upper tier/30 lower tier

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Inspection planning 2– Easy Tools

- Recently implemented (2014) – Risk Assessment Tool
- frequency of routine site visits for different types of installations
- Integrated Risk Assessment Method (IRAM) which was developed by the project group “easy tools” – IMPEL project
- Web-based tool that distinguishes impact criteria and operator performance criteria

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Inspection planning 2– Easy Tools

- **Impact criteria:** emissions into the air, amount of waste, risk of accidents due to hazardous substances, compliance with permit conditions, emissions to the water, noise emissions, impact on human health and environment, distance to sensitive areas or objects

Emissions into the air:

Opis	Vrijednost
Postrojenje nema nepokretnih izvora emisija onečišćujućih tvari u zrak	0
Postrojenje ispusta onečišćujuće tvari u zrak iz nepokretnog izvora, ali nisu prekoračene GVE	1
Postrojenje ispusta onečišćujuće tvari u zrak iz nepokretnog izvora - prekoračen je 1 parametar onečišćujuće tvari u iznosu do 10% GVE	2
Postrojenje ispusta onečišćujuće tvari u zrak iz nepokretnog izvora - prekoračena su 2 ili više parametara onečišćujućih tvari u iznosu do 10% GVE ili prekoračen je 1 ili više parametara onečišćujućih tvari u iznosu većem od 10% GVE	3

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Inspection planning 2– Easy Tool

Amount of waste:

Opis	Vrijednost
Na lokaciji postrojenja nastaje manje od 200 kg/god. opasnog otpada ili manje od 2 t/god. neopasnog otpada	0
Na lokaciji postrojenja nastaje manje od 200 kg/god. opasnog otpada ili 2 do 150 tona neopasnog otpada godišnje	1
Na lokaciji postrojenja nastaje više od 200 kg/god. opasnog otpada ili više od 150 tona neopasnog otpada godišnje	2
Na lokaciji se provodi gospodarenje otpadom (skupljanje, obrada ili uporaba otpada)	3

- **Operator performance criteria:** Environmental management system, Willingness of the operator to follow the rules
- The number of the highest ratings decides which category the installation is assigned to, not the average of the ratings
- Risk Category – **interval 1, 2 or 3 years** (legal base Art. 227 (4) EPA)

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Inspection planning 2– Easy Tool

Integrirana metoda procjene rizika☒

Metoda srednje linearne vrijednosti☐

Podaci o adresi

Ulica

Poštanski broj

Lokacija

Unos ocjena o utjecaju na okoliš

Kriterij utjecaja na okoliš	Najveći rezultat	Ocjena	Promjena ocjene (težina)
1 Ukupna godišnja količina otpada sukladno izdanim	4	<div></div>	<div>0</div>
Vrsta djelatnosti gospodarenja otpadom	5	<div></div>	<div>0</div>
1 Prekogranicni promet otpadom	3	<div></div>	<div>0</div>
1 Stvarna količina otpada kojom se gospodarilo u	4	<div></div>	<div>0</div>

Minimalni broj najviših ocjena

2

Najniža kategorija rizika

1

Najviša kategorija rizika

3

Unos ocjena o ponašanju operatera

Kriterij usklađenosti subjekta

Kriterij usklađenosti subjekta	Težina kriterija	Rezultat
1 Usklađenost s propisima/dozvolom	1	<div></div>
Prituzbe/prijave ili nelegalne posiljke u prethodnoj godini	1	<div></div>
Prijava u registar oneciscivaca u okolis	1	<div></div>

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Inspection planning 3– EPI data

- Taking into account inspection data
- Information and findings on potential negative effects on environment
- Perception of interested public

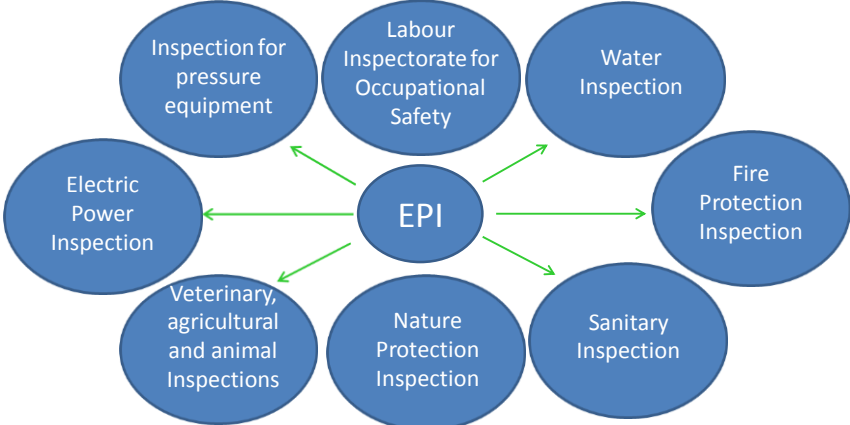


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Inspection planning 3–other Inspections

- Data and proposals from other line inspections → FINAL APPROVAL



Inspection planning - CIAWP

OCTOBER

listopad

49.	C.I.A.K. d.o.o., Zabok skladište opasnog otpada Zabok www.ciak.hr	2.5.(a) 5.1. (c)	<ul style="list-style-type: none">• Vodopravna- Mirjana Tušek• MUP• Sanitarna - Danica Matek• Elektroenergetika- Božidar Bradal• Oprema pod tlakom -Božidar Borovec• Zaštita na radu• DUZS - Nevenka Sugrenić	5. - 9.	Zora Jelić
50.	JANAF d.d. - Terminal Omišalj www.janaf.hr	SEVESO	<ul style="list-style-type: none">• Vodopravna- Dženana Avdić• MUP (nadležna Policijska uprava)• Sanitarna - Dražen Balo• Elektroenergetika - Zlatko Jurković• Oprema pod tlakom - Eol Buđić• Zaštita na radu• DUZS - Nevenka Sugrenić	5. - 9.	Miljenka Kliček
51.	OMIAL NOVI d.o.o., Omiš proizvodnja oplemenjenih folija www.omial.hr	6.7.	<ul style="list-style-type: none">• Vodopravna- Slavica Čaušić• MUP (nadležna Policijska uprava)• Sanitarna - Anđa Puljić• Elektroenergetika- Ksenija Tomić• Oprema pod tlakom - Vesna Perić• Zaštita na radu	12. - 16.	Ante Belamarić
52.	HEP-PROIZVODNJA d.o.o., Pogon EL-TO Zagreb proizvodnja toplinske i električne energije www.hep.hr	1.1.	<ul style="list-style-type: none">• Vodopravna- Zvonimir Mayer• MUP (nadležna Policijska uprava)• Sanitarna - Zvonimir Kramarić i Mirjana Brkić• Elektroenerg- Zvonko Harčič-Harčin• Oprema pod tlakom – Ivan Bažnec• Zaštita na radu	12. - 16.	Snježana Šimunić
53.	DUKAT d.d., Tvornica Sirela Bjelovar proizvodnja mljeka www.dukat.hr	6.4.(c)	<ul style="list-style-type: none">• Vodopravna- Natalija Vodepija• MUP (nadležna Policijska uprava)• Sanitarna - Valerijina Zorečić- Rubes i Katica Mrđić• Elektroenerget. – Mirjana Padovan• Oprema pod tlakom – Ivan Bažnec• Zaštita na radu• Veterinarska -Tajana Karabić	19. - 23.	Renata Miletić

Reporting after inspection

REPORT ON COORDINATED INSPECTION CONTROL – LINE INSPECTIONS

1.	Name and headquarter of operator							
2.	Site location							
3.	Description of installation, raw materials and energy used							
4.	Inspection date							
5.	Scope of inspection (entire installation, parts of installation)							
6.	Environmental permit							
	Compliance with EP legislation							
	Inspectors actions/ follow-up		Measures ordered by minutes, YES/NO, if YES – indicate measures and are they completed	Orders/ measures ordered/ order completed		Misdemeanour proposal (breach of which provision)		
7.	Hazardous substances							
	No hazardous substances in quantities prescribed by Regulation	<input type="checkbox"/>	Quantities less than lower tier according to Regulation	<input type="checkbox"/>	Quantities in range lower tier installation according to Regulation	<input type="checkbox"/>	Quantities in range upper tier installation according to Regulation – obligation of Safety report	<input type="checkbox"/>
	Compliance with Regulation on control of major accidents							
	Inspectors actions/ follow-up		Measures ordered by minutes, YES/NO, if YES – indicate measures and are they completed	Orders/ measures ordered/ order completed		Misdemeanour proposal (breach of which provision)		

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Reporting after inspection

CONSOLIDATED REPORT ON COORDINATED ENVIRONMENTAL INSPECTION

1.	Name and headquarters location	
2.	Site location	
3.	Description of the installation, Raw materials and Energy	
4.	Line inspections	
5.	Inspection date	
6.	Scope of inspection (entire Installation, parts of Installation)	
7.	Environmental Permit , activity ¹ ¹ Regulation on Environmental Permit	
	Compliance with Permit / Compliance with legislation	

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Reporting after inspection

	Inspection action/ follow up	measures ordered by minutes, YES/NO, if YES, indicate measures and are they completed	Inspectors order / measures ordered / order completed	Misdemeanor proposal (breach of what provisions)				
	Hazardous substances							
	No hazardous substances in quantities proscribed by Regulation ²	<input type="checkbox"/>	Quantities less than lower tier according to Regulation ²	<input type="checkbox"/>	Quantities in accordance with lower tier to Regulation ²	<input type="checkbox"/>	Quantities in accordance with upper tier to Regulation ² – liable to Safety Report	<input type="checkbox"/>
8.	Compliance with Regulation ²							
	² Regulation on Control of Major Accidents							
	Inspection action/ follow up	measures ordered by minutes, YES/NO, if YES, indicate measures and are they completed	Inspectors order / measures ordered / order completed	Misdemeanor proposal (breach of what provisions)				
9.	Conclusions / further actions due to IRAM							
	A) Installation is in compliance with Environmental Permit/regulation and minor irregularities. Next inspection according to IRAM B) Infringements with possible effects to human health and pollution determined. Next inspection according to IRAM C) Major Infringements. Next inspection in accordance with inspection order							

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Non routine inspections

Initiated by:

1.Complaints

2.Accidents

3.Findings from previous inspection

4.Request from other state institutions

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TWL IPA 2011 Project

- **Project purpose - to support MENP in strengthening the capacity of environmental protection inspectors to meet the requirements from Directive 2010/75/EU on Industrial Emissions (IED)**
- **Project implementation**
Twinning partners:
MENP and Environment Agency Austria
- **Duration: 1/12/2014 - 1/6/2015 + 3 months**



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TWL IPA 2011 Project

Project activities

1. **Efficient preventing and combating offences against the environment**

Stakeholders: Customs, Police, Judiciary, State Attorney and relevant inspections

2. **Efficient environmental inspections in line with IED**

Stakeholders: Sanitary Inspection, Water Protection Inspection, National Protection and Rescue Directorate



<http://www.mzoip.hr/hr/inspekcija/ostale-aktivnosti-inspekcije.html>

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TWL IPA 2011 Project

<p>Project Purpose To support Ministry of Environmental and Nature Protection in strengthening the capacity of environmental protection inspectors to meet the requirements from Directive 2010/75/EU on Industrial Emissions (IED) and together with key stakeholders combat offences against the environment.</p> <p>Project implementation The project was implemented jointly by Twinning partners: Croatian and international experts (e.g. Austria, Belgium, Slovenia and the Netherlands) works together towards an efficient implementation of relevant legislation.</p> <p>Key stakeholders included:</p> <ul style="list-style-type: none"> Ministry of Justice Ministry of Health - Sanitary Inspection Ministry of Finance - Customs Administration Ministry of Interior - Directorate for Crime Police Ministry of Agriculture - Water Protection Inspection National Protection and Rescue Directorate Justice sector (representatives of Criminal, Misdemeanour, Administrative and High Administrative Courts, Croatian Society of Court Experts, State Attorney's Office, Judicial Academy). <p>Twinning partners Ministry of Environmental and Nature Protection of the Republic of Croatia and Environment Agency Austria (Umweltbundesamt).</p> <p>Project duration Project implementation started on 1 December 2014 and lasted 6 months.</p> <p>Project funding The project was funded by the European Union within IPA programme in the amount of 170,000 € and the budget of the Republic of Croatia in the amount of 18,899 €.</p>	<p>Project Activities The project comprised two main sets of activities.</p> <p>First set of activities focused on efficient stakeholders cooperation on preventing and combating offences against the environment including preparation of recommendations and system for combating environmental offences and targeted trainings for environmental inspectors and representatives of relevant stakeholders.</p>  <p>Second set of activities focused on efficient environmental protection inspections planning and reporting by environmental inspectors and other relevant stakeholders in line with requirements and standards of IED. To achieve this the proposal for setting up an improved system for environmental protection inspection and other relevant inspection services, based on IED requirements (prioritization based on appraisal of environmental risks, collection of information and evaluation of performance, drawing up inspection plans, obligatory elements of inspection reports) was developed and targeted training for inspectors and other stakeholders implemented.</p>	<p>Results and Outputs</p> <ul style="list-style-type: none"> Recommendations for improvement of prevention, recognition, investigation, prosecution and sentencing of offences against the environment through better cooperation and coordination of all involved stakeholders proposed. Proposal for a system for the implementation of Article 23 of IED regarding environmental protection inspection and other relevant inspection services and corresponding guidelines. Capacity of stakeholders in the area of implementation and enforcement of IED enhanced. The training covered the entire territory of the Republic of Croatia. In total, 71 environmental protection inspectors and 36 representatives of key stakeholders are trained and acquainted with a new knowledge in the area of environmental inspections in line with Article 23 of IED. Capacity of environmental protection inspectors and stakeholders in prevention, recognition, investigation, prosecuting and sentencing of environmental offences enhanced. The training covered the entire territory of the Republic of Croatia. In total, 88 environmental and nature protection inspectors and 107 representatives of key stakeholders are trained and acquainted with a new knowledge in the area of environmental offences. 
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TWL IPA 2011 Project

Guidelines:

1. Guideline for inspection plans
2. Guideline for inspection programs for coordinated inspections
3. Guideline for the "content of inspection" (scope of inspection and questionnaire for inspectors, including the correct procedure in the application of BAT-conclusions)
4. Guideline for relevant information from line-inspectors for the "consolidated report"
5. Guideline for the "consolidated report"
6. Guideline for the "information on performed inspection" that is to be published

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Inspection planning-recommendations

Guideline 1 for inspection plans - how to draw up environmental inspection plan according to IED

Plan should contain:

- general assessment of relevant environmental issues (air, sea, climate and energy, soil and contaminated sites, waste, noise)
- cover whole territory of Croatia
- list of all IED installations (activities from Annex I of IED)
- procedures for drawing up programme for routine environmental inspections taking into account IRAM results, publications of BAT conclusions ..
- Procedures for non-routine environmental inspections
- Provisions on the cooperation between different inspection authorities

Plan should be regularly reviewed and updated

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Inspection planning-recommendations

Guideline 2 for inspection programme – how to make inspection programme for routine environmental inspections and determine frequency of site visit

Programme is based on Plan

Programme should contain:

- Competence and scope
 - Inspection intervals for routine environmental inspections
 - Non-routine environmental inspections
 - list of all IED installations (activities from Annex I of IED) to be inspected
- Inspection programme should cover at least period of 3 years but reviewed in shorter period of time

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Thank you for attention

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