

# Inspection Management Framework of Environmental Inspections

Ministry for Environmental and Nature Protection

Dubravka Pajkin Tučkar, Senior Environmental Inspector

## Environmental inspection

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



## History

- 1997:IMPEL – Guidance on Minimum Criteria for Inspections
- 1999:IMPEL -Reference Book for Environmental Inspections
- 2001:EU –Recommendation on Minimum Criteria for Environmental Inspections 2001/331/EC
- 2007: IMPEL –Step by Step Guidance Book for Planning of Environmental Inspections
- 2011: IMPEL –easyTools Risk Assessment Guidance Book
- 2011: EU -Industrial Emissions Directive
- 2012: IMPEL –Guidance for IED Inspections



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## Environmental Protection Inspection in Croatia

- 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 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...



30.11.2015.

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## Legal base

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- Directive 2010/75/EU of the European Parliament and the Council on industrial emissions (the Industrial Emissions Directive or IED) 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)



30.11.2015.



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## Industrial Emission Directive , **Article 23 (2)** IED 2010/75/EC

- Member States shall ensure that all installations are covered by an environmental **inspection plan** at national, regional or local level and shall ensure that this plan is regularly reviewed and, where appropriate, updated



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## Industrial Emission Directive , Article 23 (3) IED 2010/75/EC

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.

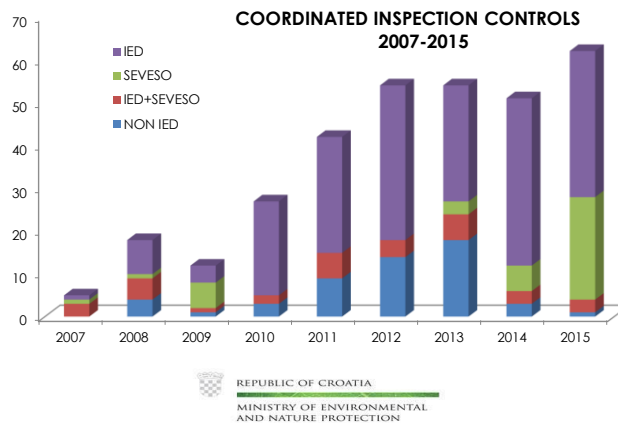
## Industrial Emission Directive , Article 23 (4) IED 2010/75/EC

- 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.



## Coordinated inspections in Croatia

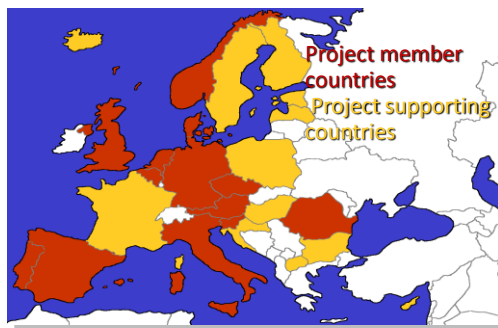
- Coordinated inspections since 2007 according to *Agreement on cooperation between inspection services* – installations with significant environmental impact (Annex I IED, SEVESO, both IED & SEVESO, others)



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## Croatia Experiences in Inspection Planning

- 2010 - 2012. easyTools Project: Risk assessment in inspection planning  
main objective of the project was to develop an easy and flexible risk assessment tool as part of the planning of environmental inspections linked to European environmental law (IED and SEVESO) and the RMCEI
- new rule based methodology was developed and tested, called **Integrated Risk Assessment Method (IRAM)**
- Croatia was participating in the Project



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## Croatia Experiences in Inspection Planning

- IRAM is web based programme for risk assessment in inspection planning -Address of the programme:  
<https://www.fms.nrw.de/lip/authenticate.do>
- The programme distinguishes between:  
**Coordinator** ---► decides on inspection task, criteria, and steering terms and factors  
**Inspector** -----► does the risk assessment
- 2013. Croatia set the national coordinator for IRAM Method, but how to implement IRAM and start the whole process?  
How to build up the system?



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## Croatia Experiences in Inspection Planning

### Environmental Inspection Cycle - Basic princip:

- **Planning**

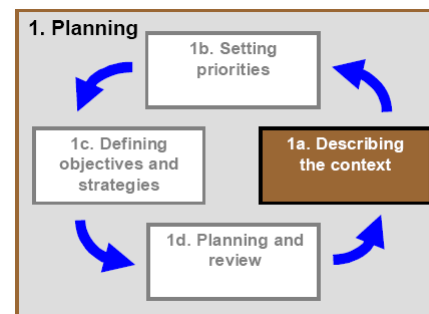
1a. Describing the context

1b. Setting priorities

1c. Defining objectives

1d. Planning and review

- Execution framework
- Execution and Reporting
- Performance monitoring



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## Croatia Experiences in Inspection Planning

### The first step in Planning cyclic proces

#### 1a. Describing the context

- identifying the scope, defining mission, tasks and goals



## Croatia Experiences in Inspection Planning

#### 1a.Describing the context

- INPUT:** legal obligations to inspect, permit situation, register of activities and installations for which the inspecting authority is competent to (numbers and geographical distribution of installations), information about companies and installations that fall under the competence of the authority, relevant legislation and regulations, compliance behaviour, the inspection resources (financial and human) that are available for the inspecting authority...



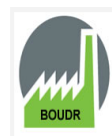
data for the risk assessment IRAM → OUTPUT

# Croatia Experiences in Inspection Planning

## Planning cyclic proces

### 1a.Describing the context

- Data base of installations (IED) in EPA (AZO)
- Data base of issued permits (IED) in MENP (MZOIP)
- Geographical area: Republic of Croatia
- 178 IED installation
- 25 SEVESO upper tier installation /30 lower tier installation
- 267 waste management operators



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http://boudr.azo.hr/Tvrtke.aspx

Datoteka Uređivanje Prikaz Favoriti Alati Pomoć

AGENCIJA ZA ZAŠTITU OKOLIŠA

Očevidnik uporabnih dozvola kojima su utvrđeni objedinjeni uvjeti zaštite okoliša i rješenja o objedinjenim uvjetima zaštite okoliša za postojeća postrojenja

**Tvrtke**

Unesite pojam za pretraživanje:  - Pretraži -  
(Unesite dio naziva tvrtke, broja djelatnosti, naziva djelatnosti, MBSa, sjedišta ili naziva grada)

	R.Br.	Tvrtka	Sjedište	Grad	Županija	MBS	Oznaka djelatnosti	Broj postrojenja tvrtke
Detalji	102	"PETRINJAK" proizvodnja, trgovina i usluge	Horvatsko bb	Klenovnik	Varaždinska županija	92384374	6.6a	1
Detalji	159	6. maj d.o.o.	Tribje 2	Umag	Istarska županija	040053074	5.4	1
Detalji	123	ABS Sisak d.o.o.	Braće Kavurić 12	Sisak	Sisačko - moslavačka županija	120002079	2.2	1
Detalji	116	Adria Čelik d.o.o.	dr. Franje Tuđmana 78	Kaštel Sućurac	Šplitsko - dalmatinska županija	080777902	2.4	1
Detalji	93	Agencija za gospodarenje otpadom d.o.o. Dubrovačko-neretvanske županije	Pred dvorom 1	Dubrovnik	Dubrovačko - neretvanska županija	090019826	5	1
Detalji	51	Agrokoka - Pula d.o.o.	Valmade 58	Pula	Istarska županija	040055867	6.6a	1
Detalji	148	Agrokorko energija d.o.o.	Trg Dražena Petrovića 3	Zagreb	Grad Zagreb	080738166	5	1
Detalji	18	Agromedimurje	Rudera Boškovića 10	Čakovec	Međimurska županija	070013017	6.6b	1
Detalji	140	Agroproteinka d.d.	Strojarska cesta 11	Kraljevec	Grad Zagreb	080758522	6.5	1
Detalji	37	Aluflexpack Novi d.o.o.	Murvica b.b.	Zadar	Zadarska županija	110029472	6.7	1
Detalji	46	Belje d.d.	Sv. I. Krstitelja 1a	Darda	Osječko - baranjska županija	030023435	6.6b	1
Detalji	47	Belje d.d.	Sv. I. Krstitelja 1a	Darda	Osječko - baranjska županija	030023435	6.6c	1
Detalji	6	Belje d.d.	Industrijska zona 1	Darda	Osječko - baranjska županija	030023435	6.6c	1
Detalji	4	Belje d.d.	Industrijska zona 1	Darda	Osječko - baranjska županija	030023435	6.6c	1

Administracija

Korisnik:

Zaporka:

OK

Početna stranica

Popis tvrtki

Popis akata

Popis korisnika

Zatražite pristupne podatke

Kontakt

Odjava

10:35 2.10.2015.



http://boudr.azo.hr/Postrojenja.aspx?TvrkaID=55

Datoteka Uređivanje Prikaz Favoriti Alati Pomoć

**AGENCIJA ZA ZAŠTITU OKOLIŠA**

Očevidnik uporabnih dozvola kojima su utvrđeni objedinjeni uvjeti zaštite okoliša i rješenja o objedinjenim uvjetima zaštite okoliša za postojeća postrojenja

**Administracija**

Korisnik:

Zaporka:

OK

Početna stranica  
Popis tvrtki  
Popis akata  
Popis korisnika  
Zatražite pristupne podatke  
Kontakt  
Odjava

**OPĆI PODACI**

**Naziv:** Aluflexpack Novi d.o.o.

**Djelatnost:** Postrojenja za površinsku obradu tvari, predmeta ili proizvoda u kojima se koriste organska otapala, osobito za apretiranje, tiskanje, premazivanje, odmašćivanje, prevlačenje vodonepropusnim slojem, obradu zatvaranja površinskih pora, bojenje, dšćenje ili impregniranje, kapaciteta potrošnje preko 150 kg na sat ili više od 200 tona na godinu.

**Adresa:** Murvica b.b.

**Grad:** Zadar

**Županija:** Zadarska županija

**MBS:** 110029472

**Postrojenja**

**Naziv:** Aluflexpack Novi - pogon Umag

**Adresa:** Ungarija b.b.

**Grad:** Umag

**Županija:** Istarska županija

**Djelatnost:** Postrojenja za površinsku obradu tvari, predmeta ili proizvoda u kojima se koriste organska otapala, osobito za apretiranje, tiskanje, premazivanje, odmašćivanje, prevlačenje vodonepropusnim slojem, obradu zatvaranja površinskih pora, bojenje, dšćenje ili impregniranje, kapaciteta potrošnje preko 150 kg na sat ili više od 200 tona na godinu.

**Novo:** Ne

**Komentar:**

--- Akti postrojenja ---

**Naziv:** Rješenje o objedinjenim uvjetima zaštite okoliša

**Klasa:** UP/I 351-03/12-02/14

**Datum Izdavanja:** 31.5.2013.

**Link dokumenta:** [Rješenje 24 06 2013 2 Aluflexpack.pdf](#)

**AZO Datum Ur. broj:** 27.6.2013.

**Redni broj:** 39

**Ur. broj:** 517-06-2-2-1-12-32

**Datum do kojeg akt vrijedi:** 30.5.2018.

**AZO Ur. broj:** 18-13-5059/u

10:38  
2.10.2015.

ID 1 obveznika okolišne dozvole za IRAM - Microsoft Excel

ID	Name of operator	Address	Location	County	Activity
1.	HEP-Proizvodnja d.o.o. - EL-TO ZAGREB	Zagorska 1	Zagreb	Grad Zagreb	1.1.
2.	HEP-Proizvodnja d.o.o. - KTE Jertovec	Jertovec, Jertovec 151	Konjšćinja	Krapinsko - zagorska	1.1.
3.	HEP-Proizvodnja d.o.o. - TE PLOMIN 1	Plomin bb	Plomin	Istarska	1.1.
4.	HEP-Proizvodnja d.o.o. - TE RUEKA	Šetaliste kostrenskih pomoraca 80	Kostrena	Primorsko - goranska	1.1.
5.	HEP-Proizvodnja d.o.o. - TE SISAK	Ulica braće Bobetko 40	Sisak	Sisačko - moslavačka	1.1.
6.	HEP-Proizvodnja d.o.o. - TE-TO OSJEK	Martina Divalta 203	Osijek	Osječko - baranjska	1.1.
7.	HEP-Proizvodnja d.o.o. - TE-TO ZAGREB	Kuševačka 10 a	Zagreb	Grad Zagreb	1.1.
8.	TE PLOMIN d.o.o. - TE PLOMIN 2	Plomin bb	Plomin	Istarska	1.1.
9.	HEP-Toplinarstvo d.o.o., Pogon Osijek	Zagreb, Miševačka 15a	Ulica cara Hadrjana 4, Osijek	Osječko - baranjska	1.1.
10.	Gradska toplana d.o.o.	Tina Ujevića 7	Karlovac	Karlovačka	1.1.
11.	INA - Industrija nafte d.d. Rafinerija nafte Sisak	A. Kovačića 1	Sisak	Sisačko - moslavačka	1.1. 1.2.
12.	INA d.d., SD Rafinerija i marketing, Centar proizvodnje, Rafinerija nafte Rijeka	Urinj	Kostrena	Primorsko - goranska	1.1. 1.2.
13.	PETROKEMIJA d.d.	Kutina, Aleja Vukovar 4	Kutina, Aleja Vukovar 4	Sisačko - moslavačka	1.1. 4.2. (a), (b), (c), (e) 4.3. 4.4. 1.1.

Spreman

100% 12:00  
14.9.2015.

## Croatia Experiences in Inspection Planning

### Planning cyclic proces

#### 1b. Setting priorities

(Croatia approach and experiences in creating risk assessment forms in IRAM method)

- Croatia used experience of our neighboring country-Slovenia trough ECRAN and IMPEL meetings
- Participation in these networks was of the great benefit for Croatia



- Advantage:
  - no language barrier
  - there is no significant differences between type and number of IED installation and other installations /operators

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## Croatia Experiences in Inspection Planning

### Planning cyclic proces

#### 1b. Setting priorities

**Impact criteria (IC) in Risk Assessment Forms in IRAM method:**



- Emissions into the air
- Amount of hazardous and non hazardous 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



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## Croatia Experiences in Inspection Planning

### Planning cyclic proces

#### 1b. Setting priorities

Operator performance criteria:

- Compliance with permit conditions
- Attitude of the operator
- Environmental management system, ISO 14001, EMAS



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### Guidance book

- Introduction in Risk Assessment
- Integrated Risk Assessment Method (IRAM)
- Manual of the online IRAM tool
- Examples of impact and probability criteria



- [http://impel.eu/wp-content/uploads/2012/09/easyTools\\_Guidance-Book\\_-2012-06-2.pdf](http://impel.eu/wp-content/uploads/2012/09/easyTools_Guidance-Book_-2012-06-2.pdf)



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## Croatia Experiences in Inspection Planning

### 1b. Setting priorities

- National coordinator for implementation of IRAM method formed **working group of 5 inspectors** and performed training in web application IRAM and started to develop a set of risk criteria that are relevant for Croatia installation/operators (you can use and copy Template from IRAM but it is not always applicable)



- Open discussion in developing impact criteria (IC) for IED installation and (IC) for operators in waste management sector
- Currently - SEVESO (IC) is in realization

## Croatia Experiences in Inspection Planning

### 1b. Setting priorities

- on an annual meeting for environmental inspectors in 2014. information about obligation of using risk assessment tool (IRAM) was passed to all inspectors
- national coordinator provides registration of all inspectors in the system, detailed instructions of use IRAM
- obligation for each inspector to report about IRAM evaluation through consolidated Report
- good cooperation between inspectors and coordinator

## Experiences in Croatia in creating Risk Assessment

### Reporting – consolidated report

	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)
	<b>Hazardous substances</b>			
	No hazardous substances in quantities proscribed by Regulation <sup>2</sup>	<input type="checkbox"/>	Quantities less than lower tier according to Regulation <sup>2</sup>	<input type="checkbox"/>
			Quantities in accordance with lower tier to Regulation <sup>2</sup>	<input type="checkbox"/>
			Quantities in accordance with upper tier to Regulation <sup>2</sup> – liable to Safety Report	<input type="checkbox"/>
8.	Compliance with Regulation <sup>2</sup>			
	<sup>2</sup> 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.	<b>Conclusions / further actions due to IRAM</b> <b>A) Installation is in compliance with Environmental Permit/regulation and minor irregularities. Next inspection according to IRAM</b> <b>B) Infringements with possible effects to human health and pollution determined. Next inspection according to IRAM</b> <b>C) Major infringements. Next inspection in accordance with inspection order</b>			

30.11.2015.

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https://www.fms.nrw.de/lip/content.do Lucom Interaction Platform

Datoteka Uređivanje Prikaz Favoriti Alati Pomoć

Outlook Web App Predložena web-mjesta

IMPEL

Logged in as: Dubravka Pajkin Tuckar

**Welcome, Dubravka Pajkin Tuckar!**

Date of the last logon: 2015. studeni 15 at 21:01

You are on the IMPEL form server that provides you with an application for risk assessment in inspection planning.

**Home**  
**Forms**  
**Master data**  
**Search**  
**Support**

Lucom Interaction Platform Release 3.1.1

## Scoring of Operator Performance Criteria

The screenshot displays the Lucom Interaction Platform interface. The main window shows the 'Forms catalogue General Forms' with a list of forms including 'Integrated Risk Assessment for Inspection Planning'. A sidebar on the left contains navigation links like 'Home', 'Forms', 'Master data', 'Search', and 'Support'. A search bar is visible at the top. The 'Integrated Risk Assessment for Inspection Planning' form is open, showing a table with criteria for scoring operator performance. The table includes columns for 'Kriterij upravljanja na skali', 'Najbolji rezultat', 'Opis', and 'Promjena ocjene (vrijed)'.

Kriterij upravljanja na skali	Najbolji rezultat	Opis	Promjena ocjene (vrijed)
Enigle otkrivenih kvara u zrak	2		2
Napredna upravljanja	2		2
Risk od razlika velike nezgodnosti/opasne	2		2
Uspješnost operatera u otkrivanju opasnosti	2		2
Enigle otkrivenih kvara u vodi	2		2
Enigle kvara	2		2
Uspješnost operatera u otkrivanju kvara	2		2
Uspješnost operatera u otkrivanju kvara	2		2

Below the table, there are sections for 'Minimalni broj najgorih ocjena', 'Najbolja kategorija rizika', and 'Najbolja kategorija rizika'. The 'Kriterij upravljanja na skali' is set to 2, and the 'Kriterij upravljanja na skali' is set to 2.

The screenshot displays the 'Integrated Risk Assessment for Inspection Planning' table. The table has columns for 'nameInspector', 'inspektionObject', 'identificationNumber', 'inspection task', 'risk category', 'inspection category', 'inspection frequency', and 'latest inspection date'. The table is filtered to show records where the 'inspection task' is 'Nadzor IED'. The table contains 10 records, with the first record being '21 Zora Jelic' and the last record being '30 Danijela Granic Vlakovic'.

	nameInspector	inspektionObject	identificationNumber	inspection task	risk category	inspection category	inspection frequency	latest inspection date
<input type="checkbox"/>	21 Zora Jelic	Dalekovod Proizvodnja d.o.o.	29	Nadzor IED postrojenja	2	B	24	11.09.2016
<input type="checkbox"/>	22 Miljenka Klicek	KNAUF INSULATION	42	Nadzor IED postrojenja	2	B	24	03.11.2016
<input type="checkbox"/>	23 Jadranka Grbinc	KIM MLJEKARA KARLOVAC d.o.o.	75	Nadzor IED postrojenja	2	A	24	09.02.2017
<input type="checkbox"/>	24 Renata Miletic	DUKAT d.d.	89	Nadzor IED postrojenja	2	B	24	13.02.2017
<input type="checkbox"/>	25 Snjezana Simunic	MESSER CROATIA PLIN D.O.O.	68	Nadzor IED postrojenja	2	B	24	24.03.2017
<input type="checkbox"/>	26 Neda Gruđen	PIK VRBOVEC d.d. mesna industrija	78	Nadzor IED postrojenja	2	C	24	30.03.2017
<input type="checkbox"/>	27 Ante Belamaric	CEMEX Hrvatska d.d. Sv. Juraj	33	Nadzor IED postrojenja	2	C	24	15.04.2017
<input type="checkbox"/>	28 Diana Racki	ORIOLIK D.D.	67	Nadzor IED postrojenja	2	B	24	16.04.2017
<input type="checkbox"/>	29 Lidija Tadic	INA d.d., Rafinerija nafte Sisak	11	Nadzor IED postrojenja	2	C	24	17.04.2017
<input type="checkbox"/>	30 Danijela Granic Vlakovic	Messer Croatia Plin d.o.o.	60	Nadzor IED postrojenja	2	B	24	20.04.2017

The table is part of the 'Lucom Interaction Platform' interface, which includes a sidebar with navigation links and a search bar. The table is filtered to show records where the 'inspection task' is 'Nadzor IED'. The table contains 10 records, with the first record being '21 Zora Jelic' and the last record being '30 Danijela Granic Vlakovic'.

## ENVIRONMENTAL INSPECTION PROGRAMME FOR 2016.

ID za IRAM										
B	C	D	E	F	G	H	I	J	K	L
ID za IRAM	Operator	Adress	County	Activity	Last inspection date	Inspection frequency	Latest inspection date	Name of inspector		
83.	IPK TVORNICA ULJA ČEPIN d.o.o.	Ulica grada Vukovara 18	Čepin	Osječko - baranjska	6.4.b	27.06.2014.	24	27.06.2016.	ŠTIMAC	
21.	METALSKA INDUSTRIJA VARAŽDIN d.d.	Varaždin, Fabijanska ulica 33	Varaždinska	2.4.	21.3.2014.	24	21.3.2016.	KLIČEK		
22.	PLAMEN d.o.o. Požega	Njemačka 36	Požega	Požeško - slavonska	2.4.	16.05.2014.	24	16.05.2016.	SERTIĆ	
154.	Sipro d.o.o. Umag	Ungarija 40a	Umag	Istarska	6.7.	15.05.2014.	24	15.5.2016.	BOŽIČEVIĆ	
85.	SLADORANA d.d. Županja	Šećerana ul.	Županja	Vukovarsko-srijemska		12.09.2014.	24	12.09.2016.	SERTIĆ	
30.	DIV d.o.o. tvornica vijaka, Podružnica Knin	IV Gardijske Brigade 44	Knin	Šibensko - kninska	2.6.	25.2.2014.	24	25.02.2016.	KRNIĆ	
27.	LIPOVICA d.o.o. Popovača	Lipovečka 22	Popovača	Sisačko - moslavačka	2.5.b	28.11.2014.	24	28.11.2014.	TADIĆ	
84.	Tvornica šećera Osijek d.d.	Osijek, Frankopanska 99	Osijek, Frankopanska 99	Osječko - baranjska	6.4.b	27.10.2014.	24	27.10.2016.	SERTIĆ	
29.	DALEKOVOD-Proizvodnja d.o.o.	Trnošćica bb	Dugo Selo	Zagrebačka	2.6.	11.09.2014.	24	11.9.2016	JELIĆ	
63.	LINDE PLIN d.o.o. Mahižno	Mahižno bb	Mahižno	Karlovačka	4.1.(a)	22.09.2014.	24	22.09.2016.	ŠIMUNIĆ	

## Croatia Experiences in Inspection Planning

### 1d. Planning and execution



**Planned actions & Actions in 2015. (180 operators evaluated in IRAM)**

180 operators/ total	IED 61	%	WMI 119	%
HR/12m	15	24,6%	41	34,45%
MR/24m	33	54,1%	37	31,09%
LR/36m	13	21,3%	41	34,45%

- IED installation
- WMI-waste managemet instalations(hazardous waste, recycling)

## Croatia Experiences in Inspection Planning

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### 1d. Planning and execution



#### Planned actions

##### 2015 and 2016

- coordinated inspection controls of all IED, SEVESO and waste management installation (WMI) to collect information and assess the risk in IRAM easy tools

##### 2017

- adequate enforcement actions on all High Risk sites (HR) with low level of compliance sites, in order to reduce the non compliances
- inspection of all high risk sites (HR)

##### 2018

- follow-up inspections in order to check whether the measures were implemented and if compliance has improved (in case of HR and low compliance sites) and inspection of the MR

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# Thank you for attention

**DUBRAVKA PAJKIN TUČKAR**

Ministry of Environmental and Nature Protection

Directorate for Inspection

Radnička cesta 80, 10 000 Zagreb, Croatia

Tel. +385 1 3717 245

E-mail: [dubravka.pajkin.tuckar@mzoip.hr](mailto:dubravka.pajkin.tuckar@mzoip.hr)

Fax. +385 1 3717 212