

Environment and Climate Regional Accession Network (ECRAN)

Workshop report Activity 1.2.1 Capacity Building on Compliance with Environmental Legislation (3<sup>rd</sup> Regional Workshop)

Istanbul, 18 - 20 November 2014



# **ENVIRONMENTAL AND CLIMA REGIONAL NETWORK FOR ACCESSION - ECRAN**

# **WORKSHOP REPORT**

Activity 1.2.1

CAPACITY BUILDING ON COMPLIANCE WITH ENVIRONMENTAL LEGISLATION

(3<sup>rd</sup> Regional Workshop)

Istanbul, 18 - 20 November 2014





This Project is funded by the European Union

# **Table of Contents**

I. Background/Rationale	
II. Objectives of the training	3
General objectives	
Specific objectives	
Target group	
Expected results	
Training delivery	
Results/outputs	
III. EU policy and legislation covered by the training	5
IV. Highlights from the training workshop	
Day 1 – Grand Oztanik Hotel, Istanbul, 18 November	
Day 2 – Grand Oztanik Hotel, Istanbul, 19 November	15
Day 3 – Rayon Textile Industries and Foreign Trade Ltd. Tekirdağ / TURKEY, 20 Noven	າber 17
V. Evaluation	
ANNEX I – Agenda	
ANNEX II – Participants	
ANNEX III – Presentations and Background Materials (under separate cover)	





This Project is funded by the European Union

# **ABREVIATIONS**

LIST OF ABRE	VIATIONS
EC	European Commission
CLP	Classification, Labelling and Packaging
EU	European Union
HAZOP	Hazard Operability study elements
IED	Industrial Emission Directive
MS	Member State
REACH	Registration, Evaluation, Authorisation and Restrictions of Chemicals
RMCEI	Recommendation on minimum criteria
TFS	Transfrontier Shipment of Waste
VOC	Volatile Organic Compound
WFD	Water Framework Directive





This Project is funded by the European Union

# I. Background/Rationale

Within the RENA programme, the objective of the ECENA Working Group on Environmental Compliance and Enforcement was to improve the ability of RENA member countries to implement and enforce the EU environmental and climate acquis by increasing the effectiveness of inspecting bodies and promoting compliance with environmental requirements.

The activities for the period 2010-2013 were based on a Multi Annual Work Plan, covering the following areas:

- Training and exchange,
- Institutional and methodological development,
- Cross border enforcement.

The activities planned under ECRAN in this area will build on the results achieved under RENA. Since the work of inspectors and permit writers has to be more coordinated and connected to other activities within the environmental protection area, it has been decided that ECENA under ECRAN should be of cross cutting nature. This is particularly important as the work of ECENA is dealing with both implementation and enforcement of the EU acquis. Cooperation with policy makers and law drafters has to be strengthened in order to enable developing better implementable legislation.

The work plan covers the full period of ECRAN (i.e. October 2013 – October 2016). Under this ECENA work plan, the following specific activities have been decided to be implemented:

- 1.2.1 Capacity building on compliance with environmental legislation
- 1.2.2 External country assessments
- 1.2.3 Methodological development application of IRAM/easy Tools
- 1.2.4 Compliance with REACH/CLP Regulations;
- 1.2.5 Trans frontier Shipment of Waste (TFS);
- 1.2.6 Inspection and enforcement in other policy areas;
- 1.2.7 Inspector's participation in networking activities.

The beneficiaries are the Ministries of Environment of the beneficiary countries (Albania, Bosnia and Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Kosovo<sup>\*1</sup>, 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.

The overall objective of ECRAN 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, political targets and instruments which is a key precondition for EU accession.

<sup>&</sup>lt;sup>1</sup> 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.





# Activity1.2.1 Capacity building on compliance with environmental legislation

Beneficiary countries under this project are at different levels of transposition, implementation and enforcement of the environmental acquis. These differences are caused by different initial levels of development, national and international political decisions or complications, budgetary potential, etc.

Progress in all candidate and potential candidate countries is regularly monitored by the European Commission. The Progress monitoring reports provide the following picture.

Currently, Croatia is an EU member since 1 July 2013. Out of five candidate countries from the region (the Former Yugoslav Republic of Macedonia, Montenegro, Serbia, Albania and Turkey) two have already started the accession negotiations: Turkey in 2005 and Montenegro in 2012, while the other three are speeding up their efforts for opening the accession negotiations. Potential candidates - Bosnia and Herzegovina and Kosovo\* are also increasing their efforts in this direction.

In the field of training and exchange and methodological development it has been decided to continue the activity in organizing and implementing training courses with common inspection entitled "Capacity building on compliance with environmental legislation". The training sessions are now to be designed as regional courses with common inspections and site visits, paying attention to cross-cutting issues.

The need for information and further training have been indicated by the various countries by selecting special subjects which received some additional attention during these series of courses. Some special subjects needed only additional presentations and explanations (for example revision RMCEI, end of waste criteria). Other subjects could only be handled in a limited way and require further elaboration in future courses (REACH, SEVESO, VOCs under IED).

Considering some of the cross cutting subjects (for example IED linkages with water, air, nature legislation and those with chemicals and hazardous waste issues), most of the inspectors lack knowledge, as traditionally such subjects are in most cases handled in other ministries than the Environment Ministry.

Specifically for ECRAN/ECENA activity 1.2.1 a Training Needs Assessment has been performed and training topics have been selected (ref. TNA report, www.ecranetwork .org). Based on the selected training topics with selected industrial sites, up to eight regional training programmes are to be developed and subsequently delivered. The training programme in this activity within ECENA will have to be closely coordinated with the other ones designed for ECENA and ECRAN in general in order to avoid duplication and overlaps. Planned trainings will be delivered in close coordination with 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.). Delivered trainings will be evaluated in order to follow the level of reaching the training objectives

Chapter 2 describes the background and objectives of activity 1.2.1 with the 1st Multi-country Workshop Capacity Building on Compliance with Environmental Legislation and the topics that have been addressed.







Chapter 3 describes the EU policy and legislation covered by the training, Chapter 4 presents the workshop proceedings and Chapter 5 presents the evaluation. Furthermore the following Annexes are attached:

- Annex I: the agenda;
- Annex II: List of participants;
- Annex III: Power point presentations (downloadable under separate cover):

http://www.ecranetwork.org/ECENA

# **II. Objectives of the training**

#### General objectives

Increasing the effectiveness of inspection bodies and promoting compliance with environmental requirements

#### Specific objectives

Capacity building regarding compliance with environmental legislation through better understanding of implementation issues and identification of targeted solutions (training of inspectors and permit writers in cooperation with law drafters and policy makers)

#### Target group

The target institutions and beneficiaries are the environmental inspectors and permit writers of the Ministries of Environment in Albania, Bosnia and Herzegovina, Croatia, the Former Yugoslav Republic of Macedonia, Kosovo\*, Montenegro, Serbia and Turkey

# **Expected** results

The following result is expected for this activity

- improved functioning of environmental inspection and enforcement organizations;
- streamlined working methods and implementation of best practice in the region moving towards EU standards.

# Training delivery

Based on earlier experience, described approach and the outcomes of the TNA, the general training set-up and topics are:

**ay 1**; Mainly related to *Inspection Management* including general subjects with the regulatory cycle and inspection cycle, *IPPC/IED implementation* with inspection and permitting functions with requirements, *Cross cutting issues: IED interaction with other environmental legislation* also in relation to ambient environmental quality. Special subjects and specific directives have to be selected for specific attention including IED/IPPC interaction with EIA, ambient water quality, air quality and, nature legislation, LCP, PRTR, SEVESO II, VOCs, waste and chemical management





**Day 2**; Continuation day 1 programme and 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 trainings are designed as a series of eight follow-up modules each to be held in one of the beneficiary countries. The trainings cover cross cutting issues and are also designed in such a manner that the training programme will also allow participation of policy makers and legal drafters from other relevant WGs such as Waste, Air, Water, etc.

The agenda of the third training is included in ANNEX 1

# Results/outputs

The following results are 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.







# III. EU policy and legislation covered by the training

The training covered mainly the RMCEI, IED Directive, SEVESO and Water Framework Directive (Cross cutting issues IED/WFD).

#### **RMCEI** (http://ec.europa.eu/environment/legal/law/inspections.htm)

In 2001, recognising that there was a wide disparity between inspection systems in the Member States, the European Parliament and the Council adopted Recommendation 2001/331/EC providing for minimum criteria for environmental inspections in the Member States (RMCEI). The RMCEI contains non-binding criteria for the planning, carrying out, following up and reporting on environmental inspections. Its objective is to strengthen compliance with EU environment law and to contribute to its more consistent implementation and enforcement in all Member States.

The content of the RMCEI has strongly influenced provisions on environmental inspections in sectoral pieces of environment and climate change legislation. The European Union Network for the Implementation and Enforcement of Environment Law (IMPEL) played an important role in the preparation of the RMCEI and through its activities has also played an important role in its implementation.

#### IED (summary) Ref 1.<sup>2</sup>

Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control. This Directive brings together Directive 2008/1/EC (the 'IPPC Directive') and six other directives in a single directive on industrial emissions.

Sectors of activity .This Directive shall cover industrial activities with a major pollution potential, defined in Annex I to the Directive (energy industries, production and processing of metals, mineral industry, chemical industry, waste management, rearing of animals, etc.).The Directive shall contain special provisions for the following installations:

- combustion plants (≥ 50 MW);
- waste incineration or co-incineration plants;
- certain installations and activities using organic solvents;
- installations producing titanium dioxide.

#### **Environmental requirements**

Any industrial installation which carries out the activities listed in Annex I to the Directive must meet certain basic obligations:

- preventive measures are taken against pollution;
- the best available techniques (BAT) are applied;
- no significant pollution is caused;

<sup>&</sup>lt;sup>2</sup> REF 1) IED: http://europa.eu/legislation\_summaries/environment/soil\_protection/ev0027\_en.htm





- waste is reduced, recycled or disposed of in the manner which creates least pollution;
- energy efficiency is maximised;
- accidents are prevented and their impact limited;
- sites are remediated when the activities come to an end.

# Application of best available techniques

Industrial installations must use the best available techniques to achieve a high general level of protection of the environment as a whole, which are developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions. The European Commission must adopt BAT conclusions containing the emission levels associated with the BAT. These conclusions shall serve as a reference for the drawing up of permit conditions.

# Permit conditions

The permit must provide for the necessary measures to ensure compliance with the operator's basic obligations and environmental quality standards. These measures shall comprise at least:

- emission limit values for polluting substances;
- rules guaranteeing protection of soil, water and air;
- waste monitoring and management measures;
- requirements concerning emission measurement methodology, frequency and evaluation procedure;
- an obligation to inform the competent authority of the results of monitoring, at least annually;
- requirements concerning the maintenance and surveillance of soil and groundwater;
- measures relating to exceptional circumstances (leaks, malfunctions, momentary or definitive stoppages, etc.);
- provisions on the minimisation of long-distance or transboundary pollution;
- conditions for assessing compliance with the emission limit values.

# **Special provisions**

Special provisions shall apply to combustion plants, waste incineration and co-incineration plants, installations using organic solvents and installations producing titanium dioxide. The emission limit values for large combustion plants laid down in Annex V to the Directive are generally more stringent than those in Directive 2001/80/EC. A degree of flexibility (Transitional National Plan, limited life time derogation) shall be introduced for existing installations. For other activities subject to special provisions, the provisions of the current directives have been largely maintained.

# **Environmental inspections**

Member States shall set up a system of environmental inspections of the installations concerned. All installations shall be covered by an environmental inspection plan. The plan shall be regularly reviewed and updated.

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. It shall not exceed one year for installations posing the highest risks and three years for installations posing the lowest risks.



This Project is funded by the European Union





# SEVESO (ref 2)<sup>3</sup>

Major accidents in chemical industry have occurred world-wide. In Europe, the Seveso accident in 1976 prompted the adoption of legislation aimed at the prevention and control of such accidents. The resulting 'Seveso' directive now applies to around 10,000 industrial establishments where dangerous substances are used or stored in large quantities, mainly in the chemicals, petrochemicals, storage, and metal refining sectors.

The Seveso Directive obliges Member States to ensure that operators have a policy in place to prevent major accidents. Operators handling dangerous substances above certain thresholds must regularly inform the public likely to be affected by an accident, providing safety reports, a safety management system and an internal emergency plan. Member States must ensure that emergency plans are in place for the surrounding areas and that mitigation actions are planned. Account must also be taken of these objectives in land-use planning.

There is a tiered approach to the level of controls: the larger the quantities of dangerous substances present within an establishment, the stricter the rules ('upper-tier' establishments have bigger quantities than 'lower-tier' establishments and are therefore subject to tighter control).

# Seveso Directives I, II and III

Seveso I: Council Directive 82/501/EEC on the major-accident hazards of certain industrial activities (OJ No L 230 of 5 August 1982) – the so-called Seveso directive – was adopted in 1982. The Directive was amended twice, in 1987 by Directive 87/216/EEC of 19 March 1987 (OJ No L 85 of 28 March 1987) and in 1988 by Directive 88/610/EEC of 24 November 1988 (OJ No L 336 of 7 December 1988). Both amendments aimed at broadening the scope of the Directive, in particular to include the storage of dangerous substances. This was in response to severe accidents at the Union Carbide factory at Bhopal, India in 1984, where a leak of methyl isocyanate caused more than 2500 deaths, and at the Sandoz warehouse in Basel, Switzerland in 1986, where fire-fighting water contaminated with mercury, organophosphate pesticides and other chemicals caused massive pollution of the Rhine and the death of half a million fish.

Seveso II: On 9 December 1996, Council Directive 96/82/EC on the control of major-accident hazards – the so-called Seveso II Directive - was adopted and replaced the original Seveso Directive. Seveso II included a revision and extension of the scope; the introduction of new requirements relating to safety management systems; emergency planning and land-use planning; and a reinforcement of the provisions on inspections to be carried out by Member States.

In the light of industrial accidents (Toulouse, Baia Mare and Enschede) and studies on carcinogens and substances dangerous for the environment, the Seveso II Directive was extended by Directive 2003/105/EC of the European Parliament and of the Council of 16 December 2003 amending Council Directive 96/82/EC. The most important extensions were to cover risks arising from storage and processing activities in mining; from pyrotechnic and explosive substances; and from the storage of ammonium nitrate and ammonium nitrate based fertilizers.

<sup>&</sup>lt;sup>3</sup> REF 2): SEVESO http://ec.europa.eu/environment/seveso/





Seveso III: Further adaptation of the provisions on major accidents occurred on 4 July 2012 with publication of a replacement directive - 2012/18/EU. The main changes in this, so-called, Seveso III Directive were:

Technical updates to take account of changes in EU chemicals classification. In 2008, the Council and the European Parliament adopted a Regulation on the Classification, Labelling and Packaging (CLP) of substances and mixtures, adapting the EU system to the new UN international chemicals classification (Globally Harmonised System - GHS). In turn, this triggered the need to adapt the Seveso Directive, since its scope is based on the former chemicals classification which will be repealed by the CLP Regulation by June 2015.

Better access for citizens to information about risks resulting from activities of nearby companies, and about how to behave in the event of an accident. More effective rules on participation, by the public concerned, in land-use planning projects related to Seveso plants. Access to justice for citizens who have not been granted appropriate access to information or participation. Stricter standards for inspections of establishments to ensure more effective enforcement of safety rules.

The Seveso III Directive 2012/18/EU was adopted on 4th July 2012 and entered into force on 13th August 2012. Member States have to transpose and implement the Directive by 1st June 2015, which is also the date when the new chemicals classification legislation becomes fully applicable in Europe.

# WFD – Water Framework Directive (ref 3)<sup>4</sup>

The European Union (EU) has established a Community framework for water protection and management. Firstly, Member States must identify and analyse European waters, on the basis of individual river basin and district. They shall then adopt management plans and programmes of measures adapted to each body of water.

Targets for protection include:

- inland surface waters;
- groundwater;
- transitional waters; and
- and coastal waters.

The Framework-Directive has a number of objectives, such as preventing and reducing pollution, promoting sustainable water usage, environmental protection, improving aquatic ecosystems and mitigating the effects of floods and droughts. Its ultimate objective is to achieve "good ecological and chemical status" for all Community waters by 2015.

# Administrative arrangements

Member States have to identify all the river basins lying within their national territory and to assign them to individual river basin districts. River basins covering the territory of more than one Member State will be assigned to an international river basin district. Member States are to designate a

<sup>&</sup>lt;sup>4</sup>http://europa.eu/legislation\_summaries/environment/water\_protection\_management/l28002b\_en.htm*Directive* 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy





competent authority for the application of the rules provided for in this Framework-Directive within each river basin district.

# Identification and analysis of waters

By 2004 at the latest, each Member State shall produce:

- an analysis of the characteristics of each river basin district;
- a review of the impact of human activity on water;
- an economic analysis of water use;
- a register of areas requiring special protection;
- a survey of all bodies of water used for abstracting water for human consumption and producing more than 10 m<sup>3</sup> per day or serving more than 50 persons.

This analysis must be revised in 2013 and every six years thereafter.

#### Management plans and programmes of measures

In 2009, nine years after the Framework-Directive entered into force, management plans were produced for each river basin district, taking account of the results of the analyses and studies carried out. These plans cover the period 2009-2015. They shall be revised in 2015 and then every six years thereafter. The management plans must be implemented in 2012. They aim to:

- prevent deterioration, enhance and restore bodies of surface water, achieve good chemical and ecological status of such water by 2015 at the latest and to reduce pollution from discharges and emissions of hazardous substances;
- protect, enhance and restore the status of all bodies of groundwater, prevent the pollution and deterioration of groundwater, and ensure a balance between groundwater abstraction and replenishment;
- preserve protected areas.

The management plans for river basin districts can be complemented by more detailed management programmes and plans for a sub-basin, a sector or a particular type of water. Temporary deterioration of bodies of water is not in breach of the requirements of this Framework-Directive if it is the result of circumstances which are exceptional or could not reasonably have been foreseen and which are due to an accident, natural causes or force majeure.

Member States shall encourage participation by all stakeholders in the implementation of this Framework-Directive, specifically with regard to the management plans for river basin districts. Projects from the management plans must be submitted to public consultation for at least 6 months. From 2010, Member States must ensure that <u>water pricing policies</u> provide adequate incentives for users to use water resources efficiently and that the various economic sectors contribute to the recovery of the costs of water services, including those relating to the environment and resources.

Member States must introduce arrangements to ensure that effective, proportionate and dissuasive penalties are imposed in the event of breaches of the provisions of this Framework Directive.

A list of priority substances selected from among the ones which present a significant risk to the aquatic environment has been drawn up at European level. This list is set out in Annex X to this Framework-Directive.



This Project is funded by the European Union





# IV. Highlights from the training workshop

Reference is made to Annex I for the agenda and Annex III for the presentations.

# Day 1 – Grand Oztanik Hotel, Istanbul, 18 November

- 1. A welcome was given by Mr. Kemal Dag, Deputy General Director- General Directorate for EIA, Permitting and Inspection , and by Mr. Ibrahim Ozdemir, head of the Department of Inspection of the Ministry of Environment and Urbanization, Turkey. A brief overview was given on the developments in Turkey with the inspection systems and its organization with the on- line monitoring systems that are being introduced. The national regulations on IPPC (draft) and on chemicals (classification CLP, restrictions, registry and SDS) are being implemented. Thanks were given to the trainers for organizing the event.
- 2. The workshop was chaired by Mrs. Pinar Topkaya (ECRAN ECENA national coordinator) and Mr. Ike van der Putte (ECRAN ECENA coordinator) starting with a short welcoming and introduction on ECRAN and the ECENA Programme. The information on ECRAN and ECENA has been given including a project summary, results to be achieved, structures and planned activities. The trainers, Mr. Rob Kramers, Mr. Costa Stanisav, Mr. Christof Planitzer, Mr. Boyko Mailnov and Mr. Bjorn Bauer (day 2) were introduced.
- 3. An introductory round was held among the participants with the question on the years of experience as inspectors, permit writers and policymakers/other fields. The results showed that most of participants have extensive knowledge and experience in inspection and permit writing. Some persons were designated as Policy makers.

	Years of experience		
	1 – 5 years 5 – 10 years More than 10		
			years
Inspectors	10	10	10
Permit writers	5		
Policy makers/others		1	2

4. Mr. Rob Kramers has given an introduction on inspection management, covering in this third workshop especially the Inspection Targets in the series of (1) Environmental Inspection Cycle, (2) Setting Priorities, (3) Inspection Targets and (4) Performance Monitoring.

The Environmental Inspection Cycle consists of the following seven steps:

- 1. Describing the context;
- 2. Setting priorities;
- 3. Defining objectives and strategies;
- 4. Planning and review;
- 5. Execution framework;
- 6. Execution and reporting;
- 7. Performance monitoring.









The first 4 steps form the Planning Cycle. The output of the Planning Cycle is the inspection plan. In order to write the inspection plan the inspecting authority first has to identify the relevant activities that should be covered by the inspection plan and gather information on these activities. With this information the inspecting authority can perform an assessment of the risks of the identified activities and assign priorities to these activities.

The subject covered in this third training session (defining objectives and strategies with inspection targets) was illustrated with a case.





5. Ms. Pinar Topkaya (Ministry of Environment and Urbanization, Turkey) presented the experience of Turkey in inspection management. Ms. Topkaya started her presentation by providing figures on inspectors in Turkey. There are 21 inspector at the Ministry and 1065 inspectors at the provincial directorates. The total number of inspections in Turkey, were around 37 000 in 2013 and 26 000 in 2014. Figures were presented on the corresponding penalties that were issued. A more effective approach was envisaged. Ms. Topkaya presented the developed E-Inspection software for environmental inspection in Turkey. This E-Inspection software will enable inspectors to implement all inspection steps (planning, site visits, reporting, evaluation) online.



# The modules for inspections consist of:

Site visits and reporting:	On-site reports and inspection reports can be prepared. Check lists can be used.
Sanctions and court cases:	Records of sanctions can be kept in the system. All documents related to court cases can be installed to the system.
Off line application:	Offline application can be used for on-site reporting when there is no internet connection.
Module for planning and risk assessment:	Environmental risk categories of installations can be determined by using IRAM. Inspection programs can be prepared.
Module for complaints:	Complaints can be registered and evaluated. Installations can be inspected due to complaints.



This Project is funded by the European Union



Module for statistics and monitoring:	All statistics related to inspection data can be kept. Inspectors can access documents of previous inspections.
Module for installations:	Inspectors can reach the information in other softwares (E- EIA, E-PERMIT, Waste declaration system, Wastewater treatment plant information system, etc.) of the Ministry.
Module for delegation of authority:	The authority of inspection can be delegated to other institution. In the future these institutions will be able to use this system.
Module for inspectors:	The record of inspectors can be kept.
Module for environmental legislation:	Environmental legislation can easily be accessed by the inspectors.

The software is being tested in 13 provinces and its implementation is planned to for the whole country by the end of 2014. By the end of 2014 the Ministry will revise the legislation on environmental inspections.

In line with the elements presented by Mr. Rob Kramers, Ms Topkay described the approach in developing the inspection plan for the Samsun Province. *This case presents all steps of the environmental inspection cycle (see above) and illustrates the effective application of IRAM and integration of its results in setting inspection targets and strategies leading to an inspection plan and programme.* The planning period covered July 2013 –December 2014. Its scope covers installations in Samsun that are listed in Annex-1 and Annex-2 of the By-law on Environmental Permits and Licenses. The aim of the plan was defined as: To plan routine inspections of the installations that are subject to inspections and to define procedures for non-routine inspections (complaints, accidents etc.). There is an ongoing study in Turkey to implement the same approach for another 3 provinces.

6. In continuing the subject of inspection target and strategies in the planning cycle Mr. Rob Kramers presented the case on fine dust (PM10) see Annex with presentations. The case was elaborated with the whole group of participants, including the discussion on the various issues on dust and the elements below.







Gask	
Priorities	
Resources	
Objectives	
Reference situation	
Targats B Partomanca Indicators	
Strategies	
Panned actions & Actions	
Monitoring with Performance Indicators	

7. Ms Nazan Ozyurek (Ministry of Environment and Urbanization, Turkey) gave a presentation on Transposition of Industrial Emissions Directive into Turkish Legislation. The differences between the present permitting system (environmental permit) and the envisaged new permitting system (IPPC) were illustrated including the targets and assistance projects. In the scope of the Environment Chapter Negotiations-NPP (2009) and Strategy Paper:

2012 has been committed as the year of transposition, 2015 as the year of first implementation and 2018, by being open to negotiation, as the year of full implementation. A description was given of the accomplishments of the Technical assistance and Twinning project in the period 2011 – 2014. The twinning component produced:

- Draft By-Law on Integrated Environmental Permitting (harmonized acc. to IED Chapter 1 and 2)
- Brefs
- Published EC Decisions on BAT Conclusions
- 13 BRefs and all BRef Executive Summaries
- EC implementation reports
- IPPC Implementation Strategy
- TrainingUser Manuals for permit applicants and assesors
- Technical guides for 4 sector (Coal-fired thermal power plants, iron and steel production, textile industry and rafineries)

The technical assistance component provided:

- A Web site www.csb.gov.tr/projeler/ippc
- Regulatory Impact Assessment (RIA) studies .
- Inventory of IPPC installations . ~5300 facilities
- RIA and Training-of-trainers .~40 people have been trained





In general it has been recommended that for new installations, transition period of 7-10 years from publishing of legislation should be envisaged, whereas for existing installations a sectorial compliance calendar should be prepared.

8. Mr. Costa Stanisav presented the approach in routine and non-routine inspections in Romania. Non routine inspections are mainly carried out for solving complaints, investigating accident/incidents or at other institutions request (EPAs, Police, Public health, Sanitary-Veterinary institution etc.). The Number of hours should be planned in advance and is mainly based on experience in previous years. Routine inspections are always planned in advance (number, no of hours needed, supporting information e.g. data from other institutions, logistic needed-e.g. car, protection equipment etc.).

Practical information was provided on the report on the inspection plan of 2013 for Cluj county and also the planning elements of working hours.

9. The first day of the course was finalized with the subject of cross-cutting issues, for which IED and Water Framework Directive (WFD) has been selected to be handled in the first series of training courses. Mr. Christof Planitzer presented the interlinkages with the IED and the WFD. In this 3<sup>rd</sup> and final session on IED/WFD the guidance and checklist of IED managers on the one hand and the WFD managers on the other hand were presented. The various details have been presented in Annex on presentations.

The checklist and guidance was based on the studies on interactions have explored by IMPEL in the following two studies:

- Linking the Water Framework Directive and IPPC Directive, Phase 1, 2010. <u>http://impel.eu/wp-content/uploads/2012/02/WFD-IPPC-final-report-phase-1-GA-101118-6.pdf</u>
- Linking the Water Framework Directive and IPPC Directive, Phase 2, 2011. <u>http://impel.eu/projects/linking-the-implementation-of-the-water-framework-directive-to-</u> <u>the-implementation-of-the-ippc-directive-phase-2/</u>

# Day 2 – Grand Oztanik Hotel, Istanbul, 19 November

1. In opening the second day, Mr van der Putte summarized the outcomes of the workshop on the first day.

The subjects to be handled on day 2 were introduced and covered SEVESO as a special subject, new elements in IED permitting, introductions of the factory to be visited on day 3, introductions on BREF and Bat of the factory to be visited with planning and preparation for the site visit.

- 2. Based on earlier presentations on the SEVESO site safety report as presented by Mr. Van der Putte, Mr. Costa Stanisav presented the subject of Hazard Identification in the site safety report with Hazard Oprability study elements (HAZOP). The steps in quantitative risk assessment include:
  - hazard identification
  - > analysis of the consequences
  - frequency analysis
  - risk assessment

HAZard and OPerability study has initially been developed for installations in the chemical industry.



This Project is funded by the European Union



The method has been used for more than 40 years in practice and is still used worldwide. It is tool/ technique/ method for identification of environmental health and safety hazards.

It is primarily is dealing with qualitative aspects, and it helps the team to decide upon actions that are needed. HAZOP also identifies aspects that risk management can take into account in order to eliminate or mitigate hazard(s). Next to the requirements for a HAZOP study, a case was presented as a working exercise for the whole group of participants.

3. Mr. Boyko Malinov presented the subject of Soil and Ground water protection in the IED directive (as one of the new subjects in integrated permitting, ref article 22 IED, soil and groundwater baseline report).

The presentation especially considered the difficulties in interpretation of the various requirements in a number of articles with elements referring to:

- Relevant hazardous substances ???
- Likely to be found on site ???
- Possibility of soil and groundwater contamination -???
- Systematic appraisal of the risk of contamination ???

Furthermore the obligation to prepare a baseline report was discussed with reference to ART.22.2 -Where the activity involves the use, production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination at the site of the installation, the operator shall prepare and submit to the competent authority a baseline report before starting operation of an installation or before a permit for an installation is updated for the first time after 7 January 2013. Weaknesses and possible omissions were discussed. Finally, clarification and guidelines were given on the preparation of a baseline report.

4. Mr Doğan Yildirim (environment manager) of the Rayon Textile Industries and Foreign Trade Ltd. (http://rayon.com.tr/en/) presented the historical background of the factory, the products that are produced, the chemicals that are being used, the processes, water and energy use and the treatment of wastewater. The company has been established in 1989 and is producing fabrics for active sportswear, casual wear, military wear and technical textiles. The fabrics are mainly used to produce coats, jackets, windbreakers, raincoats, warm-ups, track suits, ski suits, shirts, pants, military clothing, ponchos, bags, tents etc. Nearly all products are exported as fabrics or as garments to international markets.

Waste water treatment is based on biological treatment and physical-chemical treatment, the latter especially to remove colour from the waste water. The treatment efficiencies of the various units were presented. The receiving water basin is class 4 representing the lower level of water quality. The authorities have the intention to build centralised water treatment plants for the industries in the industrial area in which RAYON textiles is located. The company is in the possession of ISO 9001, ISO 14001 certificates and the Oekotext standard 1000 certificate (see presentation in the Annex).

The site visit on day 3 was discussed, including the logistics.







5. In the preparation for the site visit the BAT and BREF usage were discussed in three working groups under the lively guidance of Mr. Bjorn Bauer. An introduction and summary of major elements in the BREF of Textile industries was given. The three working groups worked on the formulation of questions for the site visit on day 3 and each presented these questions.

# Day 3 – Rayon Textile Industries and Foreign Trade Ltd. Tekirdağ / TURKEY, 20 November





For the site visit the participants were guided and led through the factory and various installations as one group at the start and subsequently were divided in three sub groups with each covering a number of defined questions on a number of subjects.

Group 1 (Water consumption and discharges)

- Water consumption measurement
- Installations for reduction of water use
- Discharge permit
- Laboratory accreditation
- BAT compliance
- Wastewater discharges
- Reduction measures in water use

#### Group 2 (Chemicals)

- List of chemicals/processes/usage/products
- Storage and handling
- MSDS
- Automatic dosing/vs manual dosing
- Revision of recipes with advise from suppliers
- Optimization of processes
- Permits and safety management
- Training of employees in chemicals handling

Group 3 (Waste/Energy consumption/Air emissions)

- Raw materials
- The storage and sorting of waste with disposal
- By-products reuse
- Fuel use/air emissions/stacks and monitoring
- Energy recovery measures



This Project is funded by the European Union



Based on the findings an evaluation session was held after which the Factory management could provide their comments.

Some findings were:

Group 1 – Water: There is an automated control of water and monitoring made it possible to produce mass balances. An environmental permit was issued (2 years validity). For emergency situations of power failure, a generator is available. This has not occurred up to now. Also for the waste water treatment system spare blowers are available. Reduction measures for water (and energy) use have been implemented in some of the processes by having new equipment. Improvement measures are considered as an ongoing activity.



Group 2 – Chemicals: Use is monitored and usage per kg product can be calculated. The MSDS forms are translated into Turkish. Chemicals are stored according to the instructions, however the storage of chemicals found outside should be improved. The dosing of chemicals is taking place automatically but partly also manually (with spillages of chemicals). Although fully automated dosing systems are available on the market these are considered still as too costly.



Group 3 – Waste/energy/air emissions: Hazardous waste (8 types) are handled by a licensed company. Non- hazardous waste is being sold. Analysis is taking place 1x/year. There are 23 sources of air emissions, with monitoring 1x/2year, with natural gas (80%) and coal (20%) being used.s surface coating. Energy recovery systems (waste water) reduced consumption by 15%.



This Project is funded by the European Union



In general it can be concluded that through the permit conditions and compliance with these (see presentation Mr. Yildirim) the various main elements have been covered. However some options for improvement (chemicals handling) have been noted.



Suggested planning follow up courses

For the year 2014 the courses are planned to be held in

- Zagreb, 20-22 May (Al melting and casting)
- Skopje 10 -12 September (Brewery)
- Istanbul 18 -20 November (textile)

For the year 2015 it was suggested to have the courses in:

- Montenegro (21 -23 April) (Thermo-electric power)
- Bosnia and Herzegovina (September) (Metal industry?)
- Kosovo (November) (Ferro nickel?)

For the year 2016 it was suggested to have the courses in:

- Serbia (April)
- Albania (June)







# V. Evaluation

The following summary of the training evaluation report, developed on the basis of analysis of the training questionnaires can be given. A number of 34 out of 34 participants filled the evaluation form. It shows that the expectations of the workshop were met.

Most of the trainees indicated that the training was of a high quality and useful. The excellent preparation and knowledge of the trainers were appreciated. The site visit was very well appreciated.

#### Statistical information

Workshop Session	Capacity building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED – General introductory module/procedures
Facilitators name	Ike van der Putte/ Rob Kramers / Boyko Malinov/ Christof Planitzer/ Costa Stanislav/ Bjorn Bauer
Name and Surname of Participants (evaluators) optional	As per participants' list
	Workshop Session Facilitators name Name and Surname of Participants (evaluators) optional

# Your Expectations

Please indicate to what extent specific expectations were met, or not met:

My Expectations	My expectations were met		
	Fully	Partially	Not at all
1.Filling gaps in knowledge (several IED,inspections general and specific)	  (76%)	IIIII III (24%)	
<ol> <li>Practical experience of the new Member States and Candidate Countries</li> </ol>	  (76%)	IIIII III (24%)	



This Project is funded by the European Union





# Workshop and Presentation

Please rate the following statements in respect of this training module:

Aspect of Workshop	Excellent	Good	Average	Accept able	Poor	Unacc eptabl e
1 The workshop achieved the objectives set	 (50%)	 (44%)	II (6%)			
2 The quality of the workshop was of a high standard	 (50%)	 (41%)	III (9%)			
3 The content of the workshop was well suited to my level of understanding and experience	      (56%)	 (26%)	 (18%)			
4 The practical work was relevant and informative	 (44%)	   (35%)	 (21%)			
5 The workshop was interactive	 (53%)	 (32%)	 (12%)	l (3%)		
6 Facilitators were well prepared and knowledgeable on the subject matter	  (47%)	     (50%)		I (3%)		
7 The duration of this workshop was neither too long nor too short	 (41%)	    (50%)	III (9%)			
8 The logistical arrangements (venue, refreshments, equipment) were satisfactory	 (68%)	 (26%)		II (6%)		
9 Attending this workshop was time well spent	       (59%)	 (41%)				



This Project is funded by the European Union





# Comments and suggestions

I have the following comment and/or suggestions in addition to questions already answered:

# Workshop Sessions:

- Excellent
- Should be more focused on the selected sector.

#### Facilitators:

- Well done
- Excellent
- Good.
- Excellent (Bjorn)

# Workshop level and content:

- Excellent.







# ANNEX I – Agenda

### Day I : Tuesday 18 November 2014

Topic: Inspection Management; IPPC/IED implementation and IED cross cutting issues (water legislation linkage)

#### Co-Chairs: Mr. Ike van der Putte, Mrs. Pinar Topkaya

Start	Finish	Торіс	Speaker	Sub topic/Content		
08.00	08.45	Registration				
08.45	09.00	Opening	Kemal Dag, Deputy General Director Pinar Topkaya (ECRAN ECENA National Coördinator) Ike van der Putte (ECRAN –ECENA Coördinator)	Welcome, introduction of trainers, introduction of participants		
09.00	09.15	Introduction	Ike van der Putte (ECRAN –ECENA Coördinator)	Explanation of the training programme, information on ECRAN and defined ECENA activities		
09.15	10.15	Inspection Management	Rob Kramers – Inspection Management and planning/IED inspection, Knowledge Centre InfoMil, Ministry of Water, Directorate Environment, the Netherlands	Background and explanation of the Environmental Inspection Cycle. In this 3rd training session emphasis will be placed on defining objectives and inspection strategies. During this session the principles of inspection targets and inspection strategies will be explained through case studies		
10.15	10.30	Experience of Host country in Inspection Management	Pinar Topkaya (ECRAN ECENA National Coordinator)	Brief description of the inspection system in host country and its development.		
10.30	10.45	Coffee Break				



This Project is funded by the European Union



10.45	12.00	Implementation IPPC/IED	Rob Kramers – Inspection Management and planning/IED inspection, Knowledge Centre InfoMil, Ministry of Water, Directorate Environment, the Netherlands	Background and explanation of the Environmental Inspection Cycle. In this 3rd training session emphasis will be placed on defining objectives and inspection strategies. During this session working groups will be developing their own inspection targets and strategies
12.00	12.30	Experience of ECENA beneficiary countries in implementation IPPC/IED	ECENA country representatives	Brief description of developments in beneficiary countries
12.30	13.30	Lunch Break		
13.30	14.30	On-site inspection and planning	Costa Stanisav, Senior environmental commissioner, Regional Commissariat Cluj-Cluj County Commissariat, Romania	General requirements for inspection with guidance on IED inspections, ways to inspect, preparation and checklists. In this 3 <sup>rd</sup> training session a further elaboration is given on routine and non-routine inspections
14.30	15.00	Cross cutting issues: IED interaction with other environmental legislation	Christof Planitzer, Legal Expert, Administration Lower Austria, Department of Environment, Austria	A series of IED cross cutting subjects with other environmental legislation will be given, including those amongst other with ambient water quality, air quality, nature, waste, chemicals and EIA. In this 3rd training session further guidance is given on IED and WFD interaction (part 3).
15.00	15.15	Coffee break		







15.45	Guidance for IED managers considering cross cutting issues with other environmental legislation	Christof Planitzer, Legal Expert, Administration Lower Austria, Department of Environment, Austria	Guidance and checklists for IED managers and managers of other Directives/Regulations (3rd training: IED/WFD part 3)
16.30	Experience in other countries with IED interaction with other environmental legislation in other countries	Christof Planitzer, Legal Expert, Administration Lower Austria, Department of Environment, Austria Ike van der Putte (ECRAN ECENA Coordinator)	Experience description in other selected countries (3rd training IED/WFD part 3)
17.00	Questions and discussion	Participants	
	Closure	Ike van der Putte (ECRAN ECENA Coordinator) Pinar Topkaya (ECRAN ECENA National Coordinator)	
	15.45 16.30 17.00	15.45Guidance for IED managers considering cross cutting issues with other environmental legislation16.30Experience in other countries with IED interaction with other environmental legislation in other countries17.00Questions and discussion17.00Closure	15.45Guidance for IED managers considering cross cutting issues with other environmental legislationChristof Planitzer, Legal Expert, Administration Lower Austria, Department of Environment, Austria16.30Experience in other countries with IED interaction with other environmental legislation in other countriesChristof Planitzer, Legal Expert, Administration Lower Austria, Department of Environment, Austria Iower Austria, Department of Expert, Administration Lower Austria, Department of Expert, Administration Lower Austria, Department of Environment, Austria Ike van der Putte (ECRAN ECENA Coordinator)17.00Questions and discussionParticipants17.00ClosureIke van der Putte (ECRAN ECENA Coordinator)17.00ClosureIke van der Putte (ECRAN ECENA Coordinator)17.01ClosureIke van der Putte (ECRAN ECENA Coordinator)17.02ClosureIke van der Putte (ECRAN ECENA Coordinator)

Day 2: Wednesday 19 November 2014							
Special s	Special subjects (SEVESO) and preparation for common inspection/site visit						
08.45	09.30	Special subject SEVESO	Costa Stanisav, Senior environmental commissioner, Regional Commissariat Cluj-Cluj County Commissariat, Romania Ike van der Putte (ECRAN ECENA Coordinator)	A strong relationship exists between the IPPC/IED installations and SEVESO installations. In a series of presentations introductions are given on the major elements of the SEVESO Directive with developments from SEVESO I to SEVESO III, Safety Report, Safety Management System, Hazard Identification, Consequence Analysis, Internal and External			





				Emergency Plans and Land-use planning. In this 3rd training session attention is paid to Site safety report with Hazard Identification
09.30	10.30	Special subject SEVESO	Costa Stanisav, Senior environmental commissioner, Regional Commissariat Cluj-Cluj County Commissariat, Romania	Part 2. ( follow up with case description)
			Ike van der Putte (ECRAN ECENA Coordinator)	
10.30	10.45	Coffee Break		
10.45	12.30	Introductions on the factory to be visited	Nazim Uysal, Invited Representative of the Factory Pinar Topkaya, Host country representative	Presentation of the factory with permit (and conditions) Exchange of experience from other ECENA countries <i>3rd training: Istanbul, Rayon</i> <i>Textile Industries and Foreign</i> <i>Trade Ltd.</i> (http://rayon.com.tr/en/)
12.30	13.30	Lunch Break		
13.30	14.15	IED permitting – new elements Ref article 22.Soil and groundwater baseline report	Boyko Malinov, Director "Preventive Activities" Directorate, Ministry of Environment and Water, Bulgaria	The IED requires for certain sectors of industry the preparation of a baseline report as a precondition to granting a permit for an installation. This baseline report should document the state of the soil and groundwater at the site of the installation. The report ultimately serves to preserve evidence and provide a reference for the obligation to return the site to its baseline state after closure. with experience in Bulgaria. <b>3rd</b>





				training: explanation and guidance is given also based on experience in Bulgaria
14.15	15.00	Introduction to BREF and BAT of the selected industry (Rayon Textile Industry) in relation to IED/IPPC permitting and inspection and in preparing the site visit	Bjorn Bauer (ECRAN ECENA SSTE) Ike van der Putte (ECRAN ECENA Coördinator)	Comparison of prevailing emission and monitoring data with the information from the BREF/BAT;BAT decision documents. Practical steps for inspection <i>3rd training: Istanbul, Rayon</i> <i>Textile Industries and Foreign</i> <i>Trade Ltd.</i> <i>(http://rayon.com.tr/en/)</i>
15.00	15.15	Coffee Break	_	
15.00	15.15	Coffee Break Planning of visits in groups with specific assignment/ Preparation for next day visit	Participants	Study in groups on the specific assignments setting up a questionnaire with questions and attention points during the site visit.
15.00 15.15 16.15	15.15 16.15 16.45	Coffee Break Planning of visits in groups with specific assignment/ Preparation for next day visit Summary of questionnaires	Participants Participants	Study in groups on the specific assignments setting up a questionnaire with questions and attention points during the site visit. Brief Presentation of questionnaires/checklists





# Day 3: Thursday 20 November 2014

Visit to PILOT FACTORY - Rayon Textile Industries, Yulaflı Köyü, Hacı Şeremet Mevkii 4. Sokak No: 6 Çorlu - Tekirdağ / TURKEY . (http://rayon.com.tr/en/)

7:30	Depart	rture from the hotel to the factory			
9.00	14.00	Visit to PILOT FACTORY	All participants		
		Preliminary discussion in the factory office		Review documentation (monitoring data, quality checks, site plans and permits. Is necessary documentation in place. Comments and questions	
		Divide into groups with chairman and reporter each. Chairman has allocated specific responsibilities to each member of the group			
		Site visit		Request site staff to provide guides: groups to see the entire site, but focus on areas: like handling storage, dust abatement, waste handling and filling stations, cleanliness of factory, evaluate surrounding area. Each member of the group	
				will make their own inspection and make notes and compare results later in the group	
		Return to Meeting room at the factory		General comments on visit site and any further questions	
14.00	15.00	Return from the factory to the hotel			







15.00	16.00	Lunch break		
16.00	16.45	Visit report preparation in groups	All participants	
16.45	17.30	Presentation of reports by members of the group	All participants	<ul> <li>Conclusions of site visit</li> <li>Suggested follow-up actions</li> </ul>
17.30		Closure		







# **ANNEX II – Participants**

First Name	Family Name	Institution Name	Country	Email
Dragan	Nikolic	Republic Administration for Inspection Activities Republic of Srpska	Bosnia and Herzegovina	d.nikolic@inspektorat.vladars.net
Dragan	Mijovic	Republic Administration for Inspection Activities Republic of Srpska,	Bosnia and Herzegovina	<u>d.mijovic@inspektorat.vladars.ne</u> <u>t</u>
Alma	Dzanovic	Federal Administration for Inspection Affairs	Bosnia and Herzegovina	Alma.Dzanovic@fuzip.gov.ba/ alma@code.ba
Suada	Numic	Federal ministry of environment and tourism	Bosnia and Herzegovina	suada.numic@gmail.com
Danilo	Kujovic	Environmental Protection Agency	Montenegro	danilo.kujovic@epa.org.me
Jelena	Nikcevic	Administration for inspection affairs	Montenegro	jelena.nikcevic@uip.gov.me
Dragana	Raonić	Ministry of Sustainable Development and Tourism	Montenegro	dragana.raonic@mrt.gov.me
Dragan	Asanovic	Environmental Protection Agency	Montenegro	dragan.asanovic@epa.org.me
Xhevdet	Haxhiaj	State Inspectorate of Environment, Forestry and Water	Albania	<u>xh.haxhiaj@hotmail.com</u>
Genti	Haderaj	State Inspectorate of Environment, Forestry and Water	Albania	genti.haderaj@hotmail.com
Dritan	Seferaj	State Inspectorate of Environment, Forestry and Water	Albania	dritan.seferi@live.com
llir	Bala	State Inspectorate of Environment, Forestry and Water	Albania	Ilir.Bala@moe.gov.al





First Name	Family Name	Institution Name	Country	Email
Muhamet	Malsiu	Mynistry of Environmental and spatial Planning	Kosovo	Muhamet.Malsiu@rks-gov.net
Mustafe	Hyseni	Mynistry of Environmental and spatial Planning	Kosovo	<u>Mustaf.Hyseni@rks-</u> gov.net/mustafahyseni@hotmail. <u>com</u>
Ismet	Dervari	Ministry of Environment and Spatial Planning	Kosovo	Ismet.Dervari@rks- gov.net/ismetdervari@yahoo.co m
Luan	Badivuku	Ministry of Environment and Spatial Planning	Kosovo	Luan.Badivuku@rks- gov.net/luanbadivuku@hotmail.c om
Dejan	Mitic	Ministry of agriculture and environment protection	Serbia	Dejan.Mitic@eko.minpolj.gov.rs
Sladjana	Špan	Ministry of agriculture and environment protection	Serbia	<u>sladjana.span@eko.minpolj.gov.r</u> <u>s</u>
Svetlana	Vasiljević	Ministry of agriculture and environment protection	Serbia	svetlana.vasiljevic@eko.minpolj. gov.rs
Velisav	Pejatovic	Ministry of agriculture and environment protection	Serbia	velisav.pejatovic@eko.minpolj.go v.rs
Firus	MEMED	State Environemntal Inspectorate	former Yugoslav Republic of Macedonia	f.memed@yahoo.com
Mite	Nachev	STATE ENVIRONMENTAL INSPECTORATE	former Yugoslav Republic of Macedonia	mitenacev@yahoo.com
Besa	Tateshi	Ministry of Environment and Physical Planning	former Yugoslav Republic of Macedonia	<u>b_tateshi@yahoo.com</u>
Svetlana	Gligorova	Ministry of Environment and Physical Planning	former Yugoslav Republic of Macedonia	<u>svetlana_gligorova@yahoo.com;</u> s.gligorova@moepp.gov.mk



This Project is funded by the European Union



A project implemented by Human Dynamics Consortium  $P_{age}31$ 

First Name	Family Name	Institution Name	Country	Email
Huseyin	Geckin	Bursa Provincial Directorate for Environment and Urbanization	Turkey	huseyin.geckin@csb.gov.tr
Abdulkerim	Ozguven	Edirne Provincial Directorate for Environment and Urbanization	Turkey	abdulkerim.ozguven@csb.gov.tr
Veysi	KALKAN	İstanbul Provincial Directorate for Environment and Urbanization	Turkey	veysi.kalkan@csb.gov.tr
Senay	ARSLAN	Ministry of Environment and Urbanization	Turkey	senay.aslan@csb.gov.tr
Nazan	OZYUREK	Ministry of Environment and Urbanization	Turkey	nazan.ozyurek@csb.gov.tr
Hatice	CESUR	Ministry of Environment and Urbanization	Turkey	hatice.cesur@csb.gov.tr
Kemal	DAG	Ministry of Environment and Urbanization	Turkey	kemal.dag@csb.gov.tr
Ihsan	YUKSEL	Tekirdag Provincial Directorate for Environment and Urbanization	Turkey	ihsan.yuksel@csb.gov.tr
Seyda	YENIKOSKER	Denizli Provincial Directorate for Environment and Urbanization	Turkey	seyda.yenikosker@csb.gov.tr
Ibrahim	OZDEMİR	Ministry of Environment and Urbanization	Turkey	ibrahim.ozdemir@csb.gov.tr
Pinar	ТОРКАҮА	Ministry of Environment and Urbanization	Turkey	pinar.topkaya@csb.gov.tr
Miljenka	Kliček	Ministry of environmental and nature protection	Croatia	miljenka.klicek@mzoip.hr



This Project is funded by the European Union





First Name	Family Name	Institution Name	Country	Email
Ivan	Pušić	Ministry of environmental and nature protection	Croatia	ivan.pusic@mzoip.hr
Miroslava	Verasto	Ministry of environmental and nature protection	Croatia	miroslava.verasto@mzoip.hr
Dubravka	Janeković	Ministry of environmental and nature protection	Croatia	dubravka.janekovic@mzoip.hr
Christof	Planitzer	Administration Lower Austria, Department of Environment	Austria	<u>chplanitzer@gmail.com</u>
Boyko	Malinov	Ministry of Environment and Waters	Bulgaria	bmalinov@abv.bg
Robert Willem	Kramers	Ministry of Infrastructure and Environment	Netherlands	<u>rob.kramers@rws.nl</u>
Costa	Stanisav	Ministry of Environment and Climate Change- National Environmental Guard	Romania	<u>cstanisav@yahoo.com</u>
Ike	van der Putte	ECRAN	Netherlands	ike.van.der.putte@rps.nl
Bjorn	Bauer	ECRAN	Denmark	bb@planmiljoe.dk

ANNEX III – Presentations and Background Materials (under separate cover) Presentations and Background Materials can be downloaded from:

http://www.ecranetwork.org/Files/Capacity\_Bulding\_EL\_Workshop\_Materials, November 2014, Is tanbul.zip





