
Environment and Climate Regional Accession Network (ECRAN)

Workshop report Capacity Building on Compliance with Environmental Legislation (Sub- Regional Workshop)

12-14 April 2016, Belgrade, Serbia

ENVIRONMENT AND CLIMATE REGIONAL NETWORK FOR ACCESSION - ECRAN

WORKSHOP REPORT

Activity 1.2.1

CAPACITY BUILDING ON COMPLIANCE WITH ENVIRONMENTAL LEGISLATION

(7th Workshop)

12 – 14 April 2016, Belgrade, Serbia



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LIST OF ABBREVIATIONS	
BAT	Best Available Techniques
BREF	BAT Reference Documents
CLP	Classification, Labelling and Packaging
EPER	European Pollutant Emission Register
EPRTD	European Pollutant Release and Transfer Register
EU	European Union
IPPC	Integrated Pollution Prevention and Control
IRAM	Integrated Risk Assessment Method
PRTR	Pollutant Release and Transfer Register
REACH	Registration, Evaluation, Authorisation and Restrictions of Chemicals
RMCEI	Recommendation Minimum Criteria for Environmental Inspections
TFS	Trans frontier Shipment of Waste
TNA	Training Need Analysis
WFD	Waste Framework Directive



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^{1*}, Montenegro, Serbia and Turkey). In addition the other ministries and other bodies and institutions will need to be actively engaged in so far as their work is relevant for the scope of ECRAN. As of September 2015, the ECRAN Secretariat has been informed by the EC TAIEX Unit that the fund allocated for financial support to Croatia has been exhausted. Croatia being an EU Member State since 2013 and having access to other

¹ This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



financial sources is not eligible to allocation of additional financial support under TAIEX. The country remains to be involved in the capacity building activities through involvement of public administration experts being engaged through TAIEX as lecturers for specific topics for workshops designed under ECRAN Working Groups.

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.

Activity 1.2.1 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 7th 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/>



II. Objectives of the training

General Objective

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

Specific Objective

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).

Training delivery

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

- **Day 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/PPC interaction with EIA, ambient water quality, air quality and, nature legislation, LCP, PRTR, SEVESO II/III, 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 7th training is included in ANNEX 1

Results/outputs

The expected results are:

- improved functioning of the environmental authorities and related authorities envisaged to be responsible for implementation of the RMCEI, IED, SEVESO and Waste Framework Directive;



- 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, PRTR, SEVESO and Waste 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 1.²

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.

² REF 1) IED: http://europa.eu/legislation_summaries/environment/soil_protection/ev0027_en.htm

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;
- 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.

SEVESO (ref 2)³

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

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

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.

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 Harmonized 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 – Waste Framework Directive (ref 3)⁴

With a view to breaking the link between growth and waste generation, the European Union (EU) has provided itself with a legal framework aimed at the whole waste cycle from generation to disposal, placing the emphasis on recovery and recycling: Directive [2008/98/EC](#) of the European Parliament and of the Council of 19 November 2008 on waste, repealing certain Directives.

This Directive establishes a legal framework for the treatment of waste within the EU. It aims at protecting the environment and human health through the prevention of the harmful effects of waste generation and waste management.

It applies to waste other than:

- gaseous effluents;
- radioactive elements;
- decommissioned explosives;
- faecal matter;
- waste waters;
- animal by-products;
- carcasses of animals that have died other than by being slaughtered;
- elements resulting from mineral resources.

Waste hierarchy

In order to better protect the environment, the Member States should take measures for the treatment of their waste in line with the following hierarchy which is listed in order of priority:

- prevention ;
- preparing for reuse;
- recycling ;
- other recovery , notably energy recovery;
- disposal.

Member States can implement legislative measures with a view to reinforcing this waste treatment hierarchy. However, they should ensure that waste management does not endanger human health and is not harmful to the environment.

⁴ <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=URISERV:ev0010&qid=1430217684302&from=EN>



Waste management

Any producer or holder of waste must carry out their treatment themselves or else have treatment carried out by a broker, establishment or undertaking. Member States may cooperate, if necessary, to establish a network of waste disposal facilities. This network must allow for the independence of the European Union with regard to the treatment of waste.

Dangerous waste must be stored and treated in conditions that ensure the protection of health and the environment. They must not, in any case be mixed with other dangerous waste and must be packaged or labelled in line with international or Community regulations.

Permits and registrations

Any establishment or undertaking intending to carry out waste treatment must obtain a permit from the competent authorities who determine notably the quantity and type of treated waste, the method used as well as monitoring and control operations.

Any incineration or co-incineration method aimed at energy recovery must only be carried out if this recovery takes place with a high level of energy efficiency.

Plans and programmes

The competent authorities must establish one or more management plans to cover the whole territory of the Member State concerned. These plans contain, notably, the type, quantity and source of waste, existing collection systems and location criteria.

Prevention programmes must also be drawn up, with a view to breaking the link between economic growth and the environmental impacts associated with the generation of waste.

These programmes are to be communicated by Member States to the European Commission.

Context

The generation of waste is increasing within the European Union. It has therefore become of prime importance to specify basic notions such as recovery and disposal, so as to better organise waste management activities.

It is also essential to reinforce measures to be taken with regard to prevention as well as the reduction of the impacts of waste generation and waste management on the environment. Finally, the recovery of waste should be encouraged so as to preserve natural resources. This Directive repeals directives [75/439/EEC](#), [91/689/EEC](#) and [2006/12/EC](#).

The European Pollutant Release and Transfer Register (E-PRTR)

The European Pollutant Release and Transfer Register (E-PRTR) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union



Member States and in Iceland, Liechtenstein and Norway

(<http://ec.europa.eu/environment/industry/stationary/eper/legislation.htm>).

The register contains data reported annually by some 30,000 industrial facilities covering 65 economic activities across Europe.

For each facility, information is provided concerning the amounts of pollutant releases to air, water and land as well as off-site transfers of waste and of pollutants in waste water from a list of 91 key pollutants including heavy metals, pesticides, greenhouse gases and dioxins for the year 2007 onwards. Some information on releases from diffuse sources is also available.

The register contributes to transparency and public participation in environmental decision-making. It implements for the European Union the UNECE (United Nations Economic Commission for Europe) PRTR Protocol to the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

The legal basis of the E-PRTR is Regulation (EC) No 166/2006.

The first reporting year under the E-PRTR was 2007, for which the data were reported in June 2009. From 2010, Member States report data to the E-PRTR by the end of March and, subsequent to this, the Register website is updated every year.



IV. Highlights from the training workshop

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

Day 1 – Hotel Astoria, Belgrade, 12 April

1. The workshop was opened by Mr. Zjelko Pantelic (ECRAN ECENA National Coordinator) and 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, Ms. Dubravka Pajkin Tučkar, Ms. Jelena Manenica and Ms. Brigitte Mrvelj Ččatka., Ms. Gisela Holzgraefe, Mr. Costa Stanisav, Mr. Huib van Westen and Mr. Jens Christensen were introduced. The workshop paid special attention to the application of the IRAM tool for inspection management, reporting under IED (EPER/PRTR) and the developments in inspection management in Serbia, and cross-cutting issues of IED and Waste. In addition the developments in implementation of SEVESO received special attention.
2. 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 some in permit writing. Some persons were designated as Policy makers.

	Years of experience		
	<i>1 – 5 years</i>	<i>5 – 10 years</i>	<i>More than 10 years</i>
Inspectors	1	3	17
Permit writers	1	4	1
Policy makers/others	1		1

3. Ms. Dubravka Pajkin Tučkar, Directorate for Inspection, Ministry of Environmental and Nature protection, Croatia gave a presentation on management and planning of risk based environmental inspections linked to European environmental legislation (IED and SEVESO) and the RMCEI. Specific reference is made to the application of the IRAM tool in Croatia.

In setting up the IRAM tool in Croatia reference was made to the 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. With Article 23 (3) stating that 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.

Article 23 (4) states subsequently that 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.

Within IMPEL, the IRAM tool has been developed to meet abovementioned requirements, with Croatia being active in its development by participating in the IMPEL initiative. The specific experience of Slovenia was used in setting up the IRAM system in Croatia.

Input: As input for the IRAM system the data were retrieved from the database of IED installations at the Croatian Environment Agency and the database on issued IED permits at the Croatian Ministry of Environmental and Nature Protection. In Croatia there are 178 IED Installations, 24 (upper tier) and 30 (lower tier) SEVESO installations and 267 waste management operators. SEVESO inspections are carried out without risk assessment and frequencies are applied as every year for upper tier installations and every 3 years for lower tier installations.

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

- 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

Operator performance criteria included:

- Compliance with permit conditions
- Attitude of the operator



- Environmental management system, ISO 14001, EMAS

Based on the input, impact criteria (IC) and operator performance criteria (OPC) applied in IRAM, the resulting inspection programme with frequencies of inspections and planned actions were described. This also included the resulting organizational and reporting issues for the inspectors. The presentation was finalised with an evaluation of the inspections carried out so far, including the coordinated inspections, and the future planned actions.

4. Brief descriptions of the inspection system in Serbia were given for IPPC installations and SEVESO installation by Mr. Aleksander Blagojevic and Mr. Slavida Bankovic respectively (Ministry of Agriculture and Environment, Serbia).

A number of 17 IPPC permits have been issued (7 by the Vojvodina, 4 by local government and 6 by the Ministry). There is a delay in issuing of IPPC permits, mainly due to the approval process by other authorities. A deadline until 31 December 2020 is applicable. The first inspection plan dated from 2013. There is a legal obligation of an inspection plan by 2016, which is to be based on risk assessment. For the latter purpose IRAM will be applied. In specific the content of the plan will be based on RMCEI and IED, whereas inspection frequency will be hazard based (IRAM) for which criteria will be used including emissions, type of installations, location and operator performance. In the 2016 Inspection plan 48 installations will be covered by the Ministry and 27 will be covered by local government.

Considering SEVESO inspections in Serbia it was mentioned that there are 10 SEVESO inspectors for 97 installations of which 44 are higher tier and 53 are lower tier. Checklists for SEVESO are available in 12 sets, which are also made available on the website of the Ministry. There are a number of 7 checklists for safety reports. Self-control is possible on the basis of abovementioned checklists. Inspections should not wait until the receipt of Safety Reports. The frequencies are 1/year for higher tier and for lower tiers three levels are applied: 1/year, 1/ 2 years and 1/ 3 years.

5. Mr. Huib van Westen (Senior- Inspector, Human Environment and Transport Inspectorate in The Netherlands) elaborated on the cross-cutting aspects of IED and Waste. Specific attention was given to:

- Waste in the IED
- European legislative framework
- Overview European Waste Directive
- European Waste List
- Overview of the Basel Convention
- Overview of the Waste Shipment Regulation

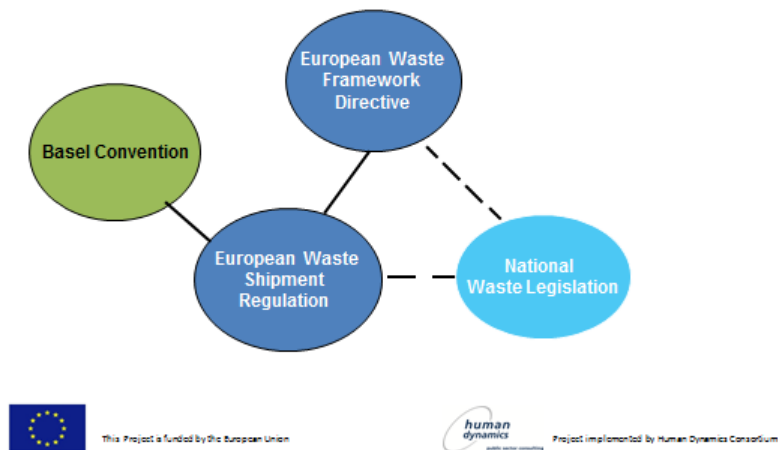
All articles in the IED Directive specifically mentioning waste were explained, starting with article 3 (definitions), specific obligations of the operator (article 11), permit application (article 12), BAT and



permits (articles 13 and 14). Specific remarks were made on the waste treatment requirement in refineries.

An overview was given of the European Waste Legislative Framework considering the interlinkage of the national Waste legislation with The European Waste Framework Directive, the Basel Convention and the European Waste Shipment Regulation. A description was given of the European Waste List. In the latter specific attention was paid to the hazardous components with specific reference to wastes from petroleum refining (chapter 5).

European Waste Legislative Framework



The presentation was finalised with a general checklist on waste which include the following questions considering Cross cutting aspects:

Cross cutting aspects

- Is there input material?
- Is this raw material or waste?
- Is there other material produced?
- Is this a by-product or waste?
- Is there waste gas treatment?
- If there is any waste being used for input or produced where is it coming from or where is it going to?
- Are the right procedures being followed?



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6. Mr. Ike van der Putte (ECRAN/ECENA coordinator) gave a presentation on the developments from EPER to PRTR. The European Pollutant Release and Transfer Register (E-PRTR) has been adopted on 18 January 2006 and laid down in Regulation (EC) No 166/2006. The PRTR's first edition has been published in the autumn of 2009 and includes data for the first reporting year 2007. The European PRTR implements the UNECE PRTR Protocol, which was signed in May 2003 in Kiev; it further replaced the European Pollutant Emission Register (EPER) that was based on Article 15(3) of Council Directive 96/61/EC concerning integrated pollution prevention and control (IPPC Directive). The difference of PRTR and EPER were explained, with the structure of the PRTR guideline.

The European Pollutant Release and Transfer Register (E-PRTR) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein, Norway, Serbia and Switzerland. Since 2007, the register contains data reported annually by more than 30,000 industrial facilities covering 65 economic activities across Europe.

For each facility, information is provided concerning the amounts of pollutant releases to air, water and land as well as off-site transfers of waste and of pollutants in waste water. Information is provided on a list of 91 key pollutants including heavy metals, pesticides, greenhouse gases and dioxins for years 2007 onwards. Some information on releases from diffuse sources is also available and will be gradually enhanced. The register contributes to transparency and public participation in environmental decision-making.

EPER and PRTR comparisons

<p>EPER: release to air and water</p> <p>50 substances</p> <p>56 industrial activities</p>
<p>PRTR: release to air, water and land</p> <p>91 substances</p> <p>65 industrial activities</p> <p><i>with reporting of emissions by accidents, diffuse sources, of-site transfers of waste and wastewater</i></p>



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An explanation was given on the reporting information flow, on what has to be reported and how reporting is to be done. Quality assurance is essential. Operators are responsible for the quality of data (completeness, consistency and credibility), competent authorities have to assess the quality with the Commission being responsible for coordination of quality assurance and assessment, Meanwhile the Commission has delivered an appropriate validation tool



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(<http://www.eionet.europa.eu/schemas/eprtr/EPTRUserManual.pdf>). Examples of reporting and reporting information flow has been given.

7. Ms. Brigitte Mrvelj Čečatka and Ms. Jelena Manenica, senior environmental protection inspectors of the Ministry of Environmental and Nature Protection, Croatia, gave a presentation on IED monitoring and reporting in Croatia. The legal obligation of monitoring lies in article 14 of the IED (permit with monitoring requirements) and article 16 of the IED (specifics of monitoring). Monitoring requirements in Croatia is part of the integrated environmental permit.

Since 2007 the Environmental Pollution Register (EPR) in Croatia contains data reported annually by ca 4800 facilities (industrial and non-industrial activities) covering 410 economic activities (more than E-PRTR) within the following 11 sectors:

- energy (01,02,03);
- production and processing of metals (04);
- mineral industry (05);
- chemical industry (06);
- waste and waste water management (07);
- paper and wood production and processing (08);
- intensive livestock production and aquaculture (09);
- animal and vegetable products from the food and beverage sector (10);
- other activities (11).

For each facility information is provided concerning the amounts of pollutant releases to air, water and land as well as produced, collected and treated waste. Reporting thresholds are however lower than in the E-PRTR Regulation.

The EPR data have various objectives and are used for various purposes including:

- Provide governments, competent authorities, policymakers and scientists with a coherent and wide industrial release and transfers database
- Used by Fund for Environmental Protection and Energy Efficiency to calculate and charge fee for release of CO₂, SO₂ and NO₂
- Used for preparation of the Annual Report on the monitoring of air pollutants from stationary sources in Croatia (in accordance with the national regulations)
- Used for making a series of other reports under international treaties and EU directives - Annual report on greenhouse gas inventory, United Nations Framework Convention on Climate Change UNFCCC, Convention on Transboundary Air Pollution (CLRTAP) and accompanying protocols, Basel Convention on the control of Transboundary Movements of



Hazardous Wastes and Convention on the protection and Sustainable Use of the Danube River (ICPDR)

- Used for other reporting obligations to EU e.g. Eionet Reporting obligations WISE - SoE Reporting: Emissions.

Croatia will report for the first time to EPRTTR over the year 2014 (to be submitted before July 2016). Public access to EPR data available on several ways:

- Direct access via allocated User Account (cca 56770 visits/year) and 2 internet browsers, one of which is linked to E-PRTR.
- Indirect via Annual reports on EPR, form „Request for information“ according to the Act on right to access information (OG 25/13), phone or e- mail (info@azo.hr and roo@azo.hr), EPR help desk (<http://helpdesk.azo.hr/>)

Practical case descriptions of monitoring and reporting were given.

Monitoring Example – Gas treatment Installation



25.4.2015.

REPUBLIC OF CROATIA
MINISTRY OF ENVIRONMENTAL
AND NATURE PROTECTION

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8. Gisela Holzgraefe (Ministry for Energy, Agriculture, Environment and Rural Areas of Land Schleswig-Holstein, Germany) discussed the interlinkages of REACH/CLP and IED and presented the outcomes of the IMPEL activities on the subject.

The Aim of REACH is to ensure a high level of protection of human health and the environment as a whole from the risks that can be posed by chemicals.

The Aim of the IED is to prevent pollution and where that is not practicable to reduce emissions from industrial activities into air, water and land in order to achieve a high level of protection of the environment as a whole.



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The IED therefore covers a subgroup of chemicals under REACH and the IED directly refers to REACH and CLP.

The interactions were explained by three examples:

- Example 1: baseline report and waste
- Example 2: new classification of formaldehyde and consequences
- Example 3: use of trace element mixtures for biogas plants

The Examples are leading to the following conclusions:

- Clear statements are needed in guidance documents (example baseline report – guidance document has no clear position concerning waste)
- Developments in legislation on chemical substances influence the work of permit authorities to a great extent (example formaldehyde)
- Up to now in many MS permit authorities and operators are not aware of the role of require

An appropriate exchange between IED and REACH regulating bodies is needed on national and on European level (including procedures for the development of BREF documents).

The Recommendations that the IMPEL project 2014 made include:

- Proposals for integration of REACH aspects into the procedure for the development of BREF documents
 - Cooperation between IPPC Bureau and ECHA in the development of BREF documents
 - General chapter on chemicals should be in the BREF documents and in the BAT conclusions, to the extent that is relevant.
 - „The use of substance x for process y is not BAT“ could be an acceptable approach for making operators substitute substance x.
 - In BREF documents appropriate alternatives for substances regulated by the REACH candidate list, Annex XIV and XVII should be mentioned.
 - BREF documents should take into account phasing out obligations under the Water Framework Directive and offer alternatives. Proposals for integration of REACH aspects into the procedure for the development of BREF documents
 - Cooperation between IPPC Bureau and ECHA in the development of BREF documents
 - General chapter on chemicals should be in the BREF documents and in the BAT conclusions, to the extent that is relevant.
 - „The use of substance x for process y is not BAT“ could be an acceptable approach for making operators substitute substance x.
 - In BREF documents appropriate alternatives for substances regulated by the REACH candidate list, Annex XIV and XVII should be mentioned.
 - BREF documents should take into account phasing out obligations under the Water Framework Directive and offer alternatives.
9. A roundtable discussion was not held separately as on each subject and presentation a QA session was included with discussion on specific experiences in the countries.

Day 2 – Hotel Astoria, Belgrade, 13 April

1. In opening the second day, Mr Ike 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, and 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. Mr. Costa Stanisav, Senior environmental commissioner, Regional Commissariat Cluj-Cluj County Commissariat, Romania presented the subject of SEVESO Inspections including Checklists.

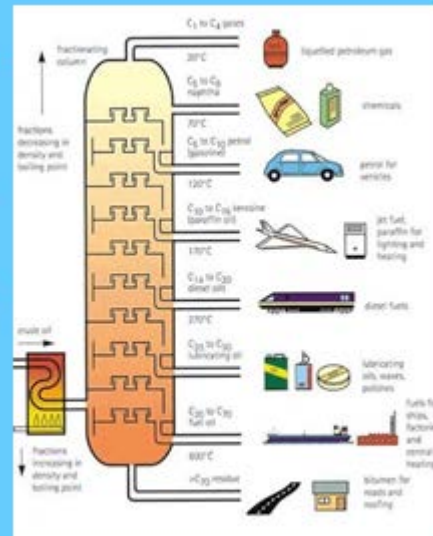
The specific contents of the presentation included:

- Case studies on two tragic Seveso accidents in Romania, happened in the same refinery
- Brief description of a refinery processes
- Presentation of checklists to be used during Seveso inspections at refineries
- Presentation of a checklist for IED directive refinery inspection



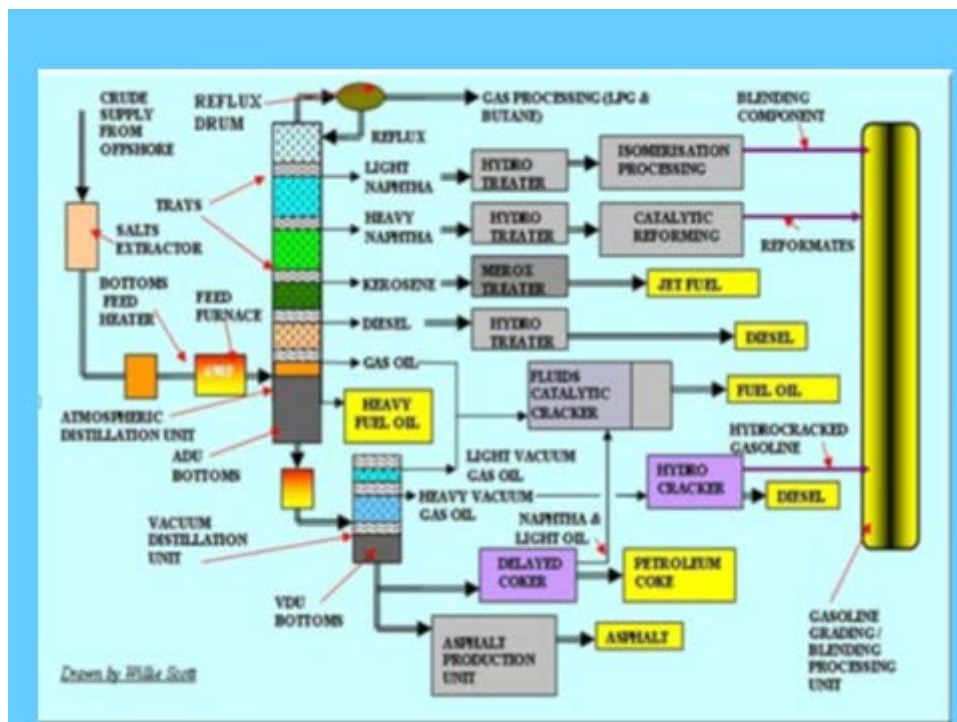
The explosion of Petrochemical installation Teleajen/Romania (7 December 1983)

- Every refinery begins with the separation of crude oil into different fractions by distillation.
- The fractions are further treated to convert them into mixtures of more useful saleable products by various methods such as cracking, reforming, alkylation, polymerization and isomerization.
- These mixtures of new compounds are then separated using methods such as fractionation and solvent extraction. Impurities are removed by various methods, e.g. dehydration, desalting, sulphur removal and hydrotreating.



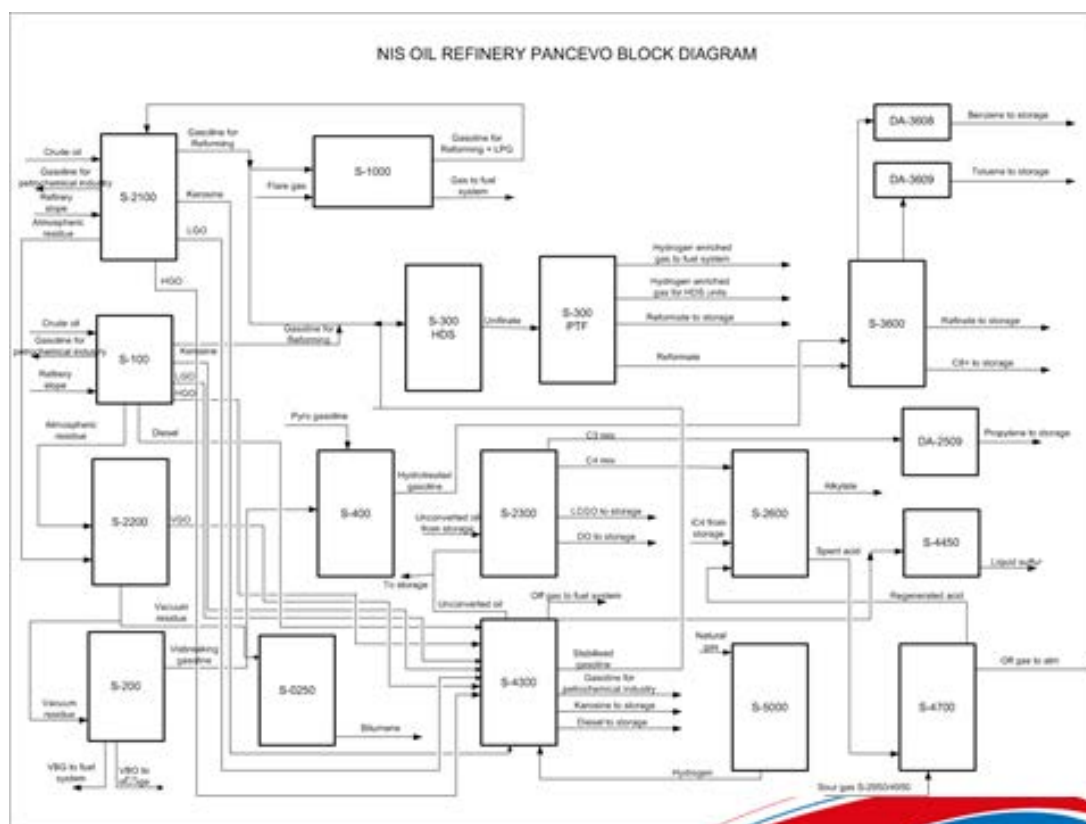
TAIEX ECRAN 80197-
Albania/Tirana 8-10 September-
2015

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3. Mr. Ike van der Putte (ECRAN ECENA coordinator) guided a series of case exercise on the assessment of SEVESO installations (Low tier/high tier assessments) after a general introduction on SEVESO II/III.
4. Mr. Iovan Iovic and Mr. Stanisa Brankov (NIS refinery, Pancevo) gave an introduction on the refinery to be visited on day 3 (14 April).

The ownership of the refinery is GAZPROM (for 55%). Rest of the ownership is in the hands of the Serbian state and partly of the employees. Production capacity refers to 4.8 mln tons of crude oil resulting in the various products (see Scheme).



The specific business activity of the NIS Oil refinery is oil refining, i.e. production of fuels, solvents, oils, lubricants, bitumen & raw materials for the petrochemical industry. There are two locations

i.e. Pancevo and Novi Sad. Raw materials are imported oil (50-70%) and domestic oil from oil fields in Vojvodina. The various processes were explained (Distillation, Catalytic Reforming, Cracking, Isomerization, Alkylation, Hydrodesulphurization, Merox process. After the presentation a QA session was held with the participants to clarify some environmental issues:

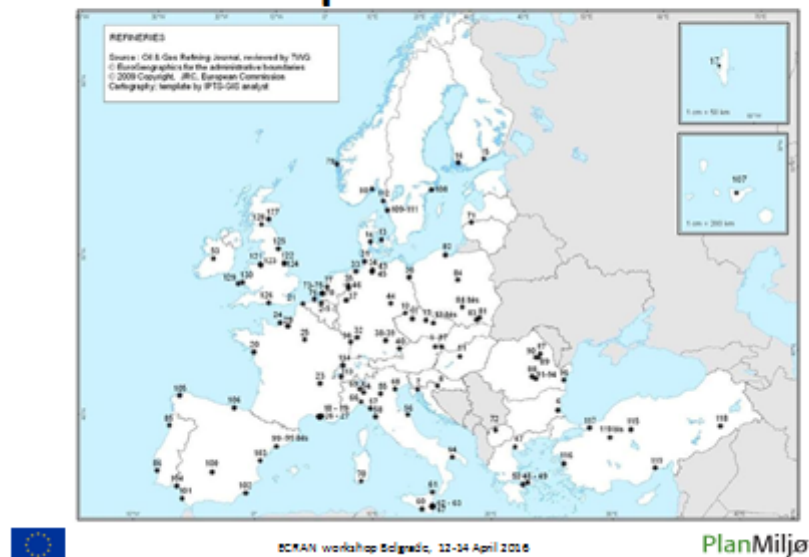
The IPPC permit is in process, with the PANCEVO refinery being included in the list of the Working Group to negotiate an extension period for IPPC implementation. Deadline for issue of the permit has been extended, with water treatment being one of the bottlenecks.

Monitoring is performed by an accredited organisation in Serbia. Partly monitoring is performed on a continuous basis for the gross pollutants. Waste and by products include Liquid Sulfur (sold), Bitumen (sold for export to Bulgaria), spent catalysts (collected by a contracted company outside Serbia).

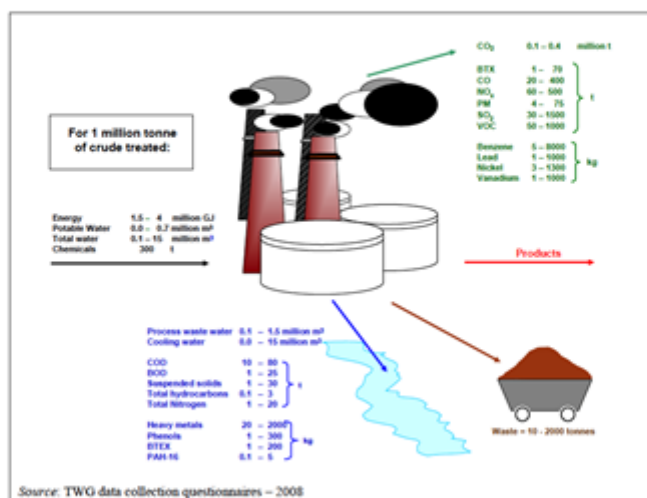
5. Mr. Jens Christensen (ECRAN ECENA SSTE) gave an introduction to BREF and BAT of the selected industry in relation to IED/IPPC permitting and inspection and in preparing the site visit. His presentation covered the BREF note 2015 and BAT conclusions (58) on Refining Oil and Gas.

After a general presentation on the oil refining sector and refining processes, the focus of the presentation was on the BAT conclusions which include a number of 18 General BAT conclusions and a number of 40 BAT conclusions for the various processes.

Geographical distribution of the European refineries



Refinery emissions



ECRAN workshop Belgrade, 12-14 April 2016

PlanMiljø

BEST AVAILABLE TECHNIQUES (BAT) CONCLUSIONS

SCOPE

GENERAL CONSIDERATIONS

1.1 GENERAL BAT CONCLUSIONS FOR THE REFINING OF MINERAL OIL AND GAS

- 1.1.1 Environmental management systems (BAT 1)
- 1.1.2 Energy efficiency (BAT 2)
- 1.1.3 Solid materials storage and handling (BAT 3)
- 1.1.4 Monitoring of emissions to air and key process parameters (BAT 4-6)
- 1.1.5 Operation of waste gas treatment (BAT 7-9)
- 1.1.6 Monitoring of emissions to water (BAT 10)
- 1.1.7 Emissions to water (BAT 10-13)
- 1.1.8 Waste generation and management BAT (14-16)
- 1.1.9 Noise (BAT 17)
- 1.1.10 BAT conclusions for integrated refinery management (BAT 18)

1.2 BAT CONCLUSIONS FOR PRODUCING PROCESSES

BAT CONCLUSIONS FOR THE ALKYLATION PROCESS

- 1.2.1 Hydrofluoric acid alkylation process (BAT 19-20)
- 1.2.2 Sulphuric acid alkylation (BAT 21)
- 1.3 OIL PRODUCTION PROCESSES (BAT 22)
- 1.4 BITUMEN PRODUCTION (BAT 23)
- 1.5 FLUID CATALYTIC CRACKING PROCESS BAT 24-27)
- 1.6 CATALYTIC REFORMING PROCESS (28)
- 1.7 COKING PROCESS (29-32)
- 1.8 DESALTING PROCESS (BAT 33)
- 1.9 COMBUSTION UNITS (BAT 34 - 37)
- 1.10 ETHERIFICATION PROCESS (BAT 38 - 39)
- 1.11 ISOMERISATION PROCESS (BAT 40)
- 1.12 NATURAL GAS REFINERY (BAT 41 - 43)
- 1.13 DISTILLATION PROCESS (BAT 44 - 46)
- 1.14 PRODUCTS TREATMENT PROCESS (BAT 47 - 48)
- 1.15 STORAGE AND HANDLING PROCESSES (49 - 52)
- 1.16 CONCLUSIONS FOR VISBREAKING AND OTHER THERMAL PROCESSES (BAT 53)
- 1.17 WASTE GAS SULPHUR TREATMENT (BAT 54)
- 1.18 FLARES (BAT 55 - 56)
- 1.19 INTEGRATED EMISSION MANAGEMENT (57 - 58)



ECRAN workshop Belgrade, 12-14 April 2016

PlanMiljø

For the group work it was decided to divide the participants in three groups, each of which had to define up to 4 questions in each of the groups in order to get an idea of the specific issues.

1. Air
2. Waste
3. Water

A general question was formulated on SEVESO and safety reports (worst case scenario).



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Formulated questions were respectively for the various groups:

Group 1, AIR:

1. Is there continuous monitoring the emissions, if not what is the frequency of monitoring?
2. Which parameters and how many sources of emissions they have?
3. What is the method of sampling (?)?
4. How are they dealing with odour complaints and which measures are taken to reduce or control odour ending the smells?

Group 2, WATER:

1. Is there being used an accredited company to do the control on polluted substances?
2. Do they have a treatment plant for waste water?
3. What is the frequency of monitoring and to whom are they reporting the results of this monitoring?
4. In case of exceeding the limits, which measures are undertaken to bring it back within the limits?

Group 3, WASTE and SOIL:

1. Which kind of wastes are being generated and do they keep records on waste flows?
2. Is there a treatment process in the plant to treat this waste which is generated by themselves?
3. Do they have an improved waste management plan?
4. Do they monitor the soil pollution and which pollutions do they have?

On SEVESO the general question was on the worst case scenarios in the Safety Report.



Day 3 – NIS oil refinery, Pancevo, 14 April



The site visit started with a detailed presentation on the processes by Mr. Iovan Iovic and Mr. Stanisa Brankov and the management team. The participants were subsequently guided by bus through the various parts of the plant.

After the visit a final Question and Answer session was held.

Based partly on the guiding questions it can be assessed that for air pollutants continuous monitoring is applied considering the gross pollutants (SO₂, NO_x, PM₁₀, CO) for 5 main sources. Other sources vary in measurements (for example 2 measurements per year). Difficulties are experienced in the loading and unloading units. Monitoring is done by an accredited organisation Serbia. In the ETS system, calculations are made. Preparations are made to monitor CO₂ (in 2016). Energy efficiency is an important item. Analyses are made and furnaces are being equipped with supporting units (for oxygen monitoring).

Waste water quality is also monitored by an accredited laboratory. Treatment is taking place with discharge ultimately into the Danube. For soil there is no monitoring taking place yet. Hazardous waste (including cleaning waste) is being co-incinerated in the cement industry (Lafarge), whereas others are to be considered as by-products (bitumen, sulphur) which are sold or exported.

Considering REACH registration (in the case of export to Europe), use is made of an only representative in Brussels. Considering information to the public it was mentioned that an alarm system is operational in the nearby municipality (emergency planning). For safety (Safety Report SEVESO), 15 scenarios have been developed and evaluated (using models). The worst case scenario is an explosion at the HDO plant (Hydro deoxygenation plant),



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Mr. Ike van der Putte thanked the management of the Company for their hospitality and openness in answering the questions and their contributions in the presentations and the site visit.



V. Evaluation and impact achieved

Impacts achieved

The objectives of the training course include increasing the effectiveness of inspection bodies and promoting compliance with environmental requirements with capacity building and better understanding of implementation issues. An important aspect is that the target group in the courses are inspectors and permit writers to improve not only the inspection but also the permitting aspects in enforcement and compliance. As participants were from different countries in the region, exchange of experience was an inherent aspect. The contribution of the training course to the defined objectives are strongly linked to the specific outputs. The following outputs and resulting impacts can be identified.

1). Inspection management. The region is now working towards streamlined working methods in inspection management. The risk based IRAM methodology has been developed through the IMPEL network and is now being applied in an increasing number of countries including the ECRAN beneficiary countries. The course has given explanations of the IRAM methodology with the experiences in practice, not only in the existing EU member countries but also in a new member country (Croatia). Within the ECRAN beneficiary countries IRAM is now fully applied or considered to be applied in Turkey, FYR of Macedonia, Serbia, Kosovo, Croatia and Bosnia Herzegovina. The latter country has asked for additional assistance via ECRAN/TAIEX to implement IRAM and integrating it into their specific IT systems. In an earlier stage additional assistance by ECRAN/TAIEX has been given to Serbia and Kosovo on a national scale whereas in the ongoing regional training courses the progress in IRAM implementation has been reported (*impact: increased effectiveness of inspection bodies*)

2). IED monitoring and reporting. In the course explanations have been given on the required systems (PRTR) and the guidance tools. Emphasis was placed this time public access, on electronic handling and the quality of the data. This not only refers to the quality requirements of monitoring (Accredited laboratories), but also to the validation of reported data (EC validation tool). Examples were given on the developments in Croatia (*impact: compliance with requirements, capacity building and better understanding of implementation issues*)

3). IED Cross cutting issues: In earlier training courses the cross-cutting issues of IED with the water legislation (Water framework directive) and Nature legislation were explained. The ECRAN beneficiary countries were kept up to date on the newest developments via IMPEL experts and via the outcomes of the newest IMPEL activities. In this training course emphasis has been given on the cross cutting issues of IED and Waste and IED and REACH/CLP. In IED/waste interactions all articles in the IED referring to waste have been explained and discussed. Examples from practice considering waste and /or by-products were given. On the IED/REACH interactions the participants were kept up to date on the analysis that have been made by IMPEL. Furthermore it was clarified that for appropriate implementation of the IED knowledge on REACH/CLP was required. The participants were informed about the recommendations by IMPEL on proposals for integration of REACH aspects into the procedure for the development of BREF documents (*impact: compliance with requirements, capacity building and better understanding of implementation issues*).

4). On the special subjects a further elaboration was given on SEVSO requirements. In this course examples were given on inspection checklists (Romania) for SEVESO installations, specifically related to the refinery sector, which is to be visited during the course. Furthermore case exercise were given on the assessment whether installations are higher tier or lower tier installations (*impact: compliance with requirements, capacity building and better understanding of implementation issues*).

5). To increase the experience in practice, the course also included a site visit to an IED and/or a SEVESO installation. In this course a refinery has been selected (INES refinery in Pancevo), which is an IED and SEVESO (higher tier) installation. Information was given to the participants on the installation with status in IPPC permitting and implementation of SEVESO. Explanations were given on the BREF and BAT decisions for these type of installations. Based on the information and guiding questions that were formulated by the participants the site visit was carried to analyse the installation considering IED and SEVESO requirements (*impact: compliance with requirements, capacity building and better understanding of implementation issues*).



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 22 out of 26 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

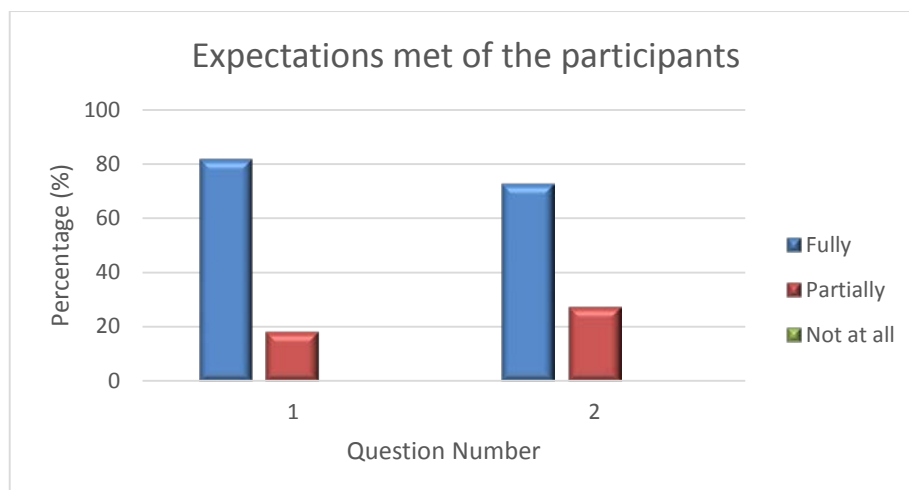
1.1	Workshop Session	Multi-beneficiary Capacity Building Workshop on Compliance with Environmental Legislation 12-14 April 2016, Belgrade, Serbia
1.2	Facilitators name	As per agenda
1.3	Name and Surname of Participants (evaluators) optional	As per participants' list

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, Inspection, management, permitting, cross cutting issues), general and specific.	 (82%)	 (18%)	
2. Practical experience of the new Member States and Candidate Countries.	I (73%)	I (27%)	

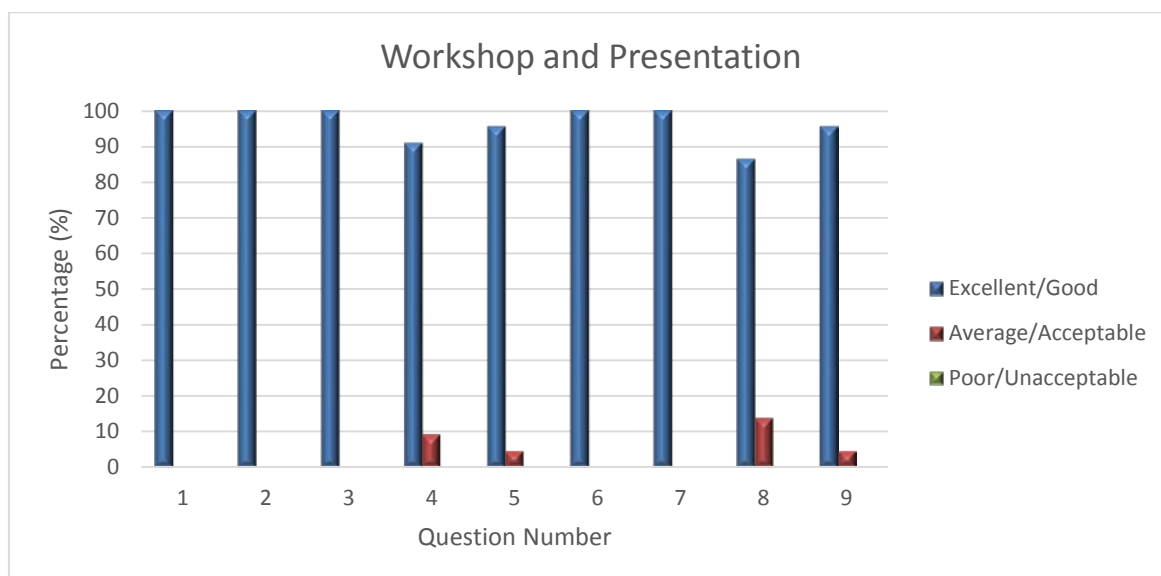




Workshop and Presentation

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

Aspect of Workshop	Excellent	Good	Average	Acceptable	Poor	Unacceptable
1. The workshop achieved the objectives set	 (59%)	 (41%)				
2. The quality of the workshop was of a high standard	 (55%)	 (45%)				
3. The content of the workshop was well suited to my level of understanding and experience	 (45%)	 (55%)				
4. The practical work was relevant and informative	 (68%)	 (23%)	I (5%)	I (4%)		
5. The workshop was interactive	 (77%)	 (18%)	I (5%)			
6. Facilitators were well prepared and knowledgeable on the subject matter	 (77%)	 (23%)				
7. The duration of this workshop was neither too long nor too short	 (55%)	 (45%)				
8. The logistical arrangements (venue, refreshments, equipment) were satisfactory	 (59%)	I (27%)	 (14%)			
9. Attending this workshop was time well spent	 (72%)	 (23%)	I (5%)			



Comments and suggestions

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

Workshop Sessions:

- Good;
- Well balanced;
- Good.

Facilitators:

- Ok;
- Excellent;

Workshop level and content:

- Ok;
 - Very Good;
-

ANNEX I – Agenda

Day 1: Tuesday 17 November 2015

Day I : Tuesday 12 April 2016

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

Co-Chairs: Mr. Ike van der Putte, Mr. Zjelko Pantelic (TBC)

Start	Finish	Topic	Speaker	Sub topic/Content
08.30	08.45	Registration		
08.45	09.00	Opening	Mr. Zjelko Pantelic (ECRAN ECENA National Coordinator) Ike van der Putte (ECRAN – ECENA Coordinator)	Welcome, introduction of trainers, introduction of participants
09.00	09.30	Introduction	Ike van der Putte (ECRAN – ECENA Coördinator)	Explanation of the training programme, information on ECRAN and defined ECENA activities
09.30	10.30	Inspection Management Framework of environmental inspections	Ms. Dubravka Pajkin Tučkar , Directorate for Inspection, Ministry of Environmental and Nature protection, Croatia	Management and planning of risk based environmental inspections linked to European environmental legislation (IED and SEVESO) and the RMCEI. Specific reference is made to the application of the IRAM tool in Croatia with practical cases
10.30	10.45	Coffee Break		
10.30	11.30	Experience of Host country in Inspection Management	Mr Slavida Bankovic / Ms. Olivera Topalov (Ministry of Agriculture and Environment, Serbia) TBC	Brief description of the inspection system in Serbia and its development considering inspection management



11.30	12.30	Implementation IPPC/IED Cross cutting issues: IED interaction with other environmental legislation	Mr. Huib van Westen (senior inspector) Intelligence and Investigation Service Waste, Industry and Businesses (TAIEX expert) Human Environment and Transport Inspectorate, the Netherlands	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 training session further guidance is given on IED and Waste legislation interaction (part 3) .
12.30	13.30	Lunch Break		
13.30	14.00	IED-Monitoring and reporting	Mr. Ike van der Putte (ECRAN-ECENA coordinator)	Introduction on further Developments regarding the implementation of the IED/IPPC requirements with specific reference to monitoring and reporting (EPER/PRTR)
14.00	15.30	IED – Monitoring and reporting	Ms. Jelena Manenica and Ms. Brigitte Mrvelj Čečatka Directorate for Inspection, Ministry of Environmental and Nature protection, Croatia (TAIEX experts)	Developments in the implementation of IED requirements in Croatia with specific reference to reporting (PRTR) and monitoring With practical cases
15.30	15.45	Coffee break		
15.45	16.45	Interlinkage REACH with IED	Gisela Holzgraefe (TAIEX expert) Ministry for Energy, Agriculture, Environment and Rural Areas of Land Schleswig-Holstein, Germany	- The IMPEL work is summarised on the IED/BAT/chemicals legislation interlinkages
16.45	17.15	Experience of ECENA beneficiary countries in implementation IPPC/IED/PRTR and IRAM	ECENA country representatives	Brief description of developments in beneficiary countries
17.00		Closure	Ike van der Putte (ECRAN ECENA Coordinator)	

			Mr. Zjelko Pantelic (ECRAN ECENA National Coordinator)	
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Day 2 : Wednesday 18 November 2015

Day 2: Wednesday 18 November 2015

Special subjects (SEVESO) and preparation for common inspection/site visit

Start	Finis h	Topic	Speaker	Sub topic/Content
09.00	09.45	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. <i>In this training session further attention is paid to the Site safety report with Hazard Identification/ Scenario selection/Consequence analysis and internal/external emergency plans</i>
09.45	10.30	Special subject SEVESO		Case exercises
10.30	10.45			
10.45	12.30	Introductions on the factory to be visited	Invited Representative of the Factory PANCEVO refinery – Mr. Svetozar Eremic HSE manager Refining Department NIS	Presentation of the factory with permit (and conditions) Exchange of experience from other ECENA countries



12.30	13.30	Lunch Break		
13.30	15.00	Introduction to BREF and BAT of the selected industry in relation to IED/IPPC permitting and inspection and in preparing the site visit	Jens Christensen (ECRAN ECENA SSTE) Ike van der Putte (ECRAN ECENA Coordinator)	Comparison of prevailing emission and monitoring data with the information from the BREF/BAT;BAT decision documents. Practical steps for inspection and preparation for site visit
15.00	15.15	Coffee Break		
15.15	16.15	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.
16.15	16.45	Summary of questionnaires	Participants	Brief Presentation of questionnaires/checklists
16.45		Closing Session	Ike van der Putte (ECRAN ECENA Coordinator)	

Day 3 : Thursday 19 November 2015

Day 3: Thursday 14 April 2016

Visit to PILOT FACTORY – NIS Oil Refinery, Pancevo

8.00	9.30	Transport from the hotel to pilot site installation	
Visit to PILOT FACTORY			
All participants			
9.30	10.00	Preliminary discussion in the factory office – Speaker Moderator: Mr. Svetozar Eremic	Review documentation (monitoring data, quality checks, site plans and permits. Is necessary documentation in place. Comments and questions



10.00	10.30	Divide into groups with chairman and reporter each. Chairman has allocated specific responsibilities to each member of the group	
10.30	13.30	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
13.30	14.30	Lunch break at the company	
14.30	15.00	General comments on site visit and any further questions	
15.00	16.30	Return to the hotel	
16.30	17.00	Visit report preparation in groups	
17.00	17.30	Presentation of reports by members of the group	<ul style="list-style-type: none"> - Conclusions of site visit - Suggested follow-up actions
17.30		Closure	



ANNEX II – Participants

Name	Surname	Institution	Country	Email
Dijana	Vasić	Ministry of Foreign Trade and Economic Relations	Bosnia and Herzegovina	dijana.vasic@mvteo.gov.ba
Dragan	Mijović	Inspectorate Republic of Srpska	Bosnia and Herzegovina	d.mijovic@inspektorat.vladars.net
Dragan	Nikolić	Inspectorate Republic of Srpska	Bosnia and Herzegovina	d.nikolic@inspektorat.vladars.net
Ljuba	Tadic	Federal office for Inspection Affairs	Bosnia and Herzegovina	ljuba.tadic@fuzip.gov.ba
Selma	Crnovršanin	Federal ministry of environment and tourism	Bosnia and Herzegovina	crnovrsanin.selmaa@gmail.com
Suada	Numic	Federal ministry of environment and tourism	Bosnia and Herzegovina	suada.numic@fmoit.gov.ba
Vesna	Ilic	Ministry of Physical Planning, Constructions and Environmental Protection of Canton Sarajevo	Bosnia and Herzegovina	vesna.ilic@mpz.ks.gov.ba
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ANNEX III – Presentations (under separate cover)

Presentations can be downloaded from:

http://www.ecranetwork.org/Files/Workshop_Materials_Common_Inspection_Serbia_April_2016.zip



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