

# Environment and Climate Regional Accession Network (ECRAN)

Workshop report
Capacity Building on
Compliance with
Environmental
Legislation (6th
Regional Workshop)

17-19 November 2015, Sarajevo, Bosnia and Herzegovina



#### **ENVIRONMENT AND CLIMATE REGIONAL NETWORK FOR ACCESSION - ECRAN**

#### **WORKSHOP REPORT**

**Activity 1.2.1** 

# CAPACITY BUILDING ON COMPLIANCE WITH ENVIRONMENTAL LEGISLATION (6<sup>th</sup> Regional Workshop)

17 – 19 November 2015, Sarajevo, Bosnia and Herzegovina





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LIST OF ABR	LIST OF ABREVIATIONS				
AFAD	Disaster and Emergency Management Presidency Turkey				
BAT	Best Available Techniques				
BOF	Basic Oxygen Furnace				
BREF	BAT Reference Documents				
CA	Competent Authority				
CLP	Classification, Labelling and Packaging				
CLRTAP	Convention on Long-range Transboundary Air Pollution				
EAC	European Accreditation Cooperation				
EC	European Commission				
EEP	External Emergency Plans				
EIA	Environmental Impact Assessment				
ELV	End of Life Vehicles				
EMAS	Eco-Management and Audit Scheme				
EPER	European Pollutant Emission Register				
EPRTR	European Pollutant Release and Transfer Register				
EU	European Union				
GHS	Globally Harmonised System				
IC	Impact Criteria				
ICPDR	International Commission for the Protection of Danube River				
IMPEL	The European Union Network for the Implementation and Enforcement of Environmental Law				
IPPC					
IRAM	Integrated Pollution Prevention and Control Integrated Risk Assessment Method				
ISO	International Standard Organisation				
LCP					
LNG	Large Combustion Plants				
LPG	Liquid Natural Gas Liquid Petroleum Gas				
MoEU	Ministry of Environment and Urbanization				
MoLSS	·				
MW	Ministry of Labour and Social Security  Mega Watts				
PRTR	Pollutant Release and Transfer Register				
REACH RMCEI	Registration, Evaluation, Authorisation and Restrictions of Chemicals Recommendation Minimum Criteria for Environmental Inspections				
TFS	Trans frontier Shipment of Waste				
TNA	Training Need Analysis				
UNFCCC	United Nation Framework Convention on Climate Change				
VOC					
WFD	Volatile Organic Compounds  Waste Framework Directive				
VVTD	VV ASLE I I AITIEWOLK DILECTIVE				





#### 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.

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







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.

#### 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 crosscutting 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 6th 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/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 6th 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, 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.

<sup>&</sup>lt;sup>2</sup> 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

<sup>&</sup>lt;sup>3</sup> 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.

<sup>4</sup> 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.







#### IV. Highlights from the training workshop

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

#### Day 1 – Hotel Europa, Sarajevo, 17 November

- 1. The workshop was chaired by Mr. Mladen Rudez (National ECENA 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 Čečatka., Mr. Costa Stanisav and Mr. Jens Christensen (day 2) were introduced. Mr. Huib van Westen was apologized due to urgent family matters. As a guest Ms. Azra Sivro, representative of Arcelor Mittal Zenica was welcomed. 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 Bosnia and Herzegovina and Turkey. In addition the developments in implementation of SEVESO in Turkey received special attention, and further developments with SEVESO.
- 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		
	1 – 5 years	l – 5 years 5 – 10 years	
			years
Inspectors	5	7	8
Permit writers	3	2	
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, 25 (upper tier) and 30 (lower tier) SEVESO installations and 267 waste management operators.

#### 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

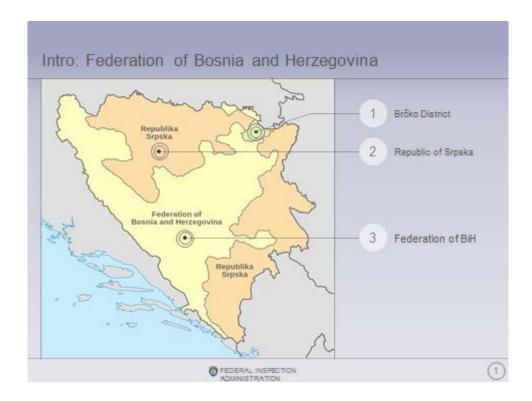






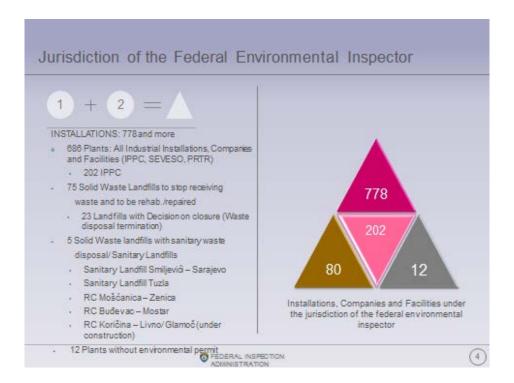
Based on the input, impact criteria (IC) and operator performance criteria (OPC) applied in IRAM, the resulting inspection programme with frequencies of inspections and planned actions were described. This also included the resulting organizational and reporting issues for the inspectors.

4. A brief description of the inspection system in Bosnia and Herzegovina and its development were given respectively by Ms. Alma Džanović, Federal inspector for environmental protection, Federal Directorate of Inspection affairs and Mr. Dragan Nikolić, Republic inspector for environment in the Republic Inspectorate.



As explained by Ms. Alma Džanović, the Federal Inspection Administration is a relatively "young" body formed in late 2006, with the official start of operation from 01.01.2007. The Federal Inspection Administration consists of 16 organizational units of which 11 Inspectorates are covering different areas of inspection. The task of remaining 5 sectors is to provide comprehensive support for Inspections. The legislative basis and the organizational structures were described with the number of installations to be controlled.





An annual inspection plan is being elaborated by the Chief inspector and approved by the Federal Ministry. Such plans are based on the RMCEI, with setting priorities for risk assessments and frequency of inspections based on identification of major pollutants and high risk installations (IPPC/SEVESO).

Inspections are carried out for each environmental media but also as integrated inspections. Routine inspections according to the annual plan cover 80% of the inspections whereas the remaining (20%) are non-routine inspections.

E-inspection software has been developed and used since 2010. This software allows each inspection to be executed electronically using laptops corresponding with a central database. Since 2012 E-inspection is also used by the Cantonal inspections.

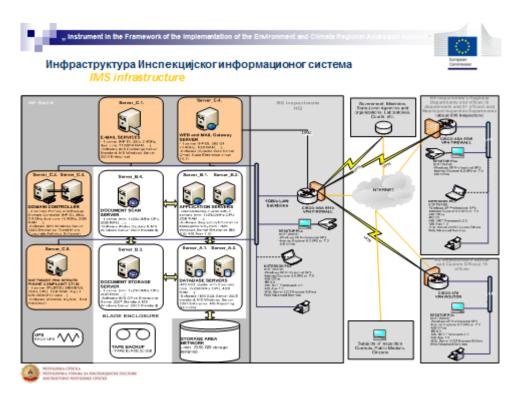






The inspection system in the Republika Srpska as explained by Mr. Dragan Nikolić is based on the RMCEI with 13 inspectors at the republic level, including environmental inspectors, 19 environmental inspectors at the municipal level, whereas 4 environmental inspectors are active at a regional level. The inspection supervises over 1,500 heavy polluters and a large number of small polluters (oil stocks and petroleum products, wood processing industry, power facilities, tanneries, objects of mining and metallurgy, processing of minerals, 100 concrete plants and 25 asphalt plants, food industry, textile industry, chemical industry. In addition control covers some entities that manage waste and special waste for which reference was made to the Waste Management Law: harvesters, processors, incinerators, transboundary movement of waste, 60 legal and a large number of illegal waste dumps.

The architecture of the Inspection Management System was described and the methodology for inspections with the electronic tools. An overview was given on the inspection results and the trends in the period 2008 - 2013.



5. Mr. Onder Gurpinar of the Ministry of Environment and Urbanization, General Directorate for Environmental Impact Assessment, Permitting and Inspection in Turkey, described a new development in inspection management. Polluting activities and industries in Turkey are obliged to employ environmental officers, establish an environmental management unit or make use of consulting firms for auditing purposes. Specific reference was made to the Turkish By-law on environmental officer, environmental management unit and environmental consulting firms. The by-law determines the principles and procedures related to their certification, quality requirements and responsibilities.

An environmental officer is to be responsible for checking activities' compliance with the legislation, effective implementation of the taken measures and conducting annual internal audits for the institutions, organizations and operators that are causing or might cause environmental pollution as







a result of their activities or are subject to inspection under the environmental law and related regulations.

A description was given on who can be an environmental officer and what (educational/experience) requirements are asked for. The responsibilities of an environmental officer are to prepare monthly activity and assessment reports for which he must be present at the facilities for:

Annex-1 companies: (not more than 1 company in a day) at least twice in a month.

Annex 2 companies: (also for the seasonal working companies' only for working period) (not more than 1 company in a day) once in a month.

An environmental officer is also responsible for internal audit reports (once per year) with the following contents:

- General information regarding the operation
- Status of the company according to the EIA legislation
- Evaluation in terms of Environmental Permit and License
- Process flow diagram of the company
- Evaluation of the company in terms of Environmental Legislation
- Accidents and Leaks
- Complaints
- Trainings
- Results and Recommendations

Training activities, updating of permits, archiving the data and being present during inspection by the Ministry or Provincial Directorates are also included in the list of responsibilities.

The minimum requirements of an environmental management unit and a consultancy firm considering the personnel structure, including the environmental officer is given. An environmental officer who is employed by an environmental management unit or a consultancy firm is being limited considering the number of r of (Annex 1 plus Annex 2) companies each environmental officer can work with. Annex 1 companies are allocated with 2 points and Annex 1 companies with 1 point. The maximum number for an environmental officer is 16 points.

The assessment process for an environmental officer, environmental management unit and an environmental consultancy firm leading to a certificate (validity 4 years) is described in detail. An overview of issued certificates are given in the following table.







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.

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#### **EPER and PRTR comparisons**

EPER: release to air and water

50 substances

56 industrial activities

PRTR: release to air, water and land

91 substances

65 industrial activities

with reporting of emissions by accidents, diffuse sources, of-site transfers of waste and wastewater





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 (<a href="http://www.eionet.europa.eu/schemas/eprtr/EPRTRUserManual.pdf">http://www.eionet.europa.eu/schemas/eprtr/EPRTRUserManual.pdf</a>). 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 EPRTR 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 (<a href="http://helpdesk.azo.hr/">http://helpdesk.azo.hr/</a>)

A practical case description of monitoring and reporting was given for a Ferrous metal foundry.





#### Ferrous metal foundry -MIV d.d. VARAŽDIN



8. A roundtable discussion was held on the implementation of IED/IPPC with specific reference to monitoring and reporting. In Serbia there are accredited laboratories to measure data. Inspectorates are to check the data. As fees are to be paid for NOx emissions the independent assessments are of crucial importance which in some cases lead to problems. Also Montenegro has an accredited laboratory for waste and noise measurements as examples. Albania has a national accredited laboratory. Operators in Albania need to have a contract with this laboratory for measurements. Kosovo\* has not a large number of operators. Only for some analyses/measurements a laboratory is accredited for checking the data. Turkey has an accredited monitoring laboratory. It has also a mobile laboratory for checking and measurements. Bosnia and Herzegovina has an institute for accreditation under the umbrella of the European cooperation for Accreditation of Certification bodies (EAC). Only for some individual parameters an accreditation/certification exist.

#### Day 2 – Hotel Europa, Sarajevo, 18 November

- 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 External Emergency Plans (EEP) as an important element in the SEVESO Directive. The requirement of the EEP, referred to in Article 12 of the SEVESO III is that, for all upper-tier establishments:
  - a. the operator draws up an internal emergency plan for the measures to be taken inside the establishment;
  - b. the operator supplies the necessary information to the competent authority, to enable the latter to draw up external emergency plans;







c. the authorities designated for that purpose by the Member State draw up an external emergency plan for the measures to be taken outside the establishment within two years following receipt of the necessary information from the operator pursuant to point (b).



The structure of an external emergency plan was explained. To illustrate the practical implementation, an example was given for an EEP for a SEVESO Chlorine Storage facility in Cluj- county

3. Mr. Onder Gurpinar of the Ministry of Environment and Urbanization, General Directorate for Environmental Impact Assessment, Permitting and Inspection in Turkey, gave an overview on SEVESO implementation in Turkey.

The legal parts on a national scale are covered by:

- By-Law on Control of Major Industrial Accidents» (official gazette date: 18/08/2010 number: 27676)
- By-Law on Preventing and Mitigating the Effects of Major Industrial Accidents» (official gazette date: 31/12/2013 number: 28867) which is compatible with the Directive 96/82/EC (Seveso II Directive)
- Revised edition is planned to be published by the end of 2015 which will be transposition of Seveso III Directive

The competent authorities are:

- The Ministry of Environment and Urbanization (MoEU);
- The Ministry of Labour and Social Security (MoLSS);







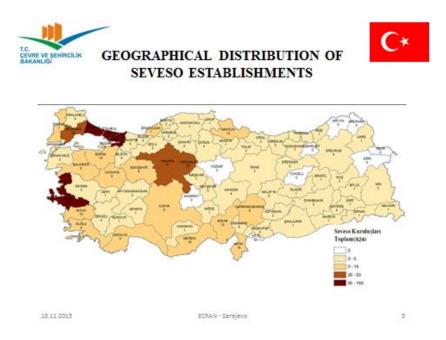
• The Disaster and Emergency Management Presidency (AFAD).

There are 924 SEVESO sites in Turkey with 413 upper tier establishments and 511 lower tier establishments.

These establishments include:

- Petrochemicals Petrochemicals (oil refineries, storage and distribution) LPG production, bottling and bulk distribution, LPG storage, LNG storage and distribution;
- Chemical Installations Industrial chemicals (Ammonia, pharmaceuticals, fertilizers, pesticides etc.);
- Manufacturing sectors Plastic, paper, rubber, textile, glass, explosives, and fireworks.

The installations are concentrated in a number of specific areas in Turkey (see figure)



An explanation was given on the notification system, indicating that since 2010 an E-notification system was in place. The presentation was finalized with a description of various projects, trainings and study tours to increase know how and capacities in Turkey.

4. Ms. Azra Sivro, manager Environment Department of Arcelor Mittal, gave an introduction on the factory to be visited on day 3. An overview was given on the various activities of Arcelor Mittal in Bosnia and Herzegovina:

#### ArcelorMittal Group units in Bosnia & Herzegovina

- ArcelorMittal Zenica, the biggest steel producer in Balkan Region located in Federation of B&H;
- ArcelorMittal Prijedor, iron ore mine, located in Republic of Srpska;



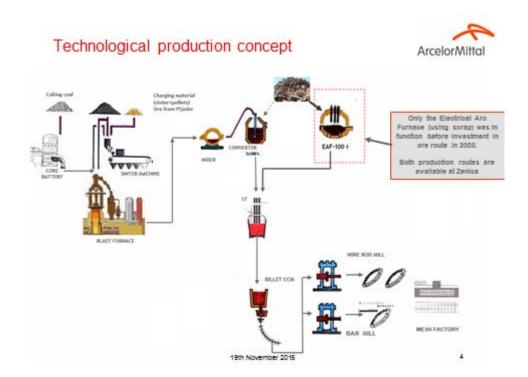




- ArcelorMittal Zenica consumes total volume of iron ore from Prijedor mine;
- Employment: direct 2.425 workers ArcelorMittal Zenica;
- workers ArcelorMittal Prijedor;
- Indirect more than 10.000 (rail ways, electricity, forwarders, metal processing companies, administration);
- Support of development other sectors connected to steel production (working with more than 300 companies customers and suppliers.

The steel factory in Zenica exists 123 years, established in 1892 by a group of Austrian industrialists and taken over in 2007 by Arcelor Mittal.

The technological production concept was explained with the various products;



ArcelorMittal Zenica consider Safety, Health and Environment as top priority

The major environmental concerns in an integrated steel plant are:

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- Dust Emissions;
- SOx Emissions;
- NOx Emissions;
- Water pollutions.

The status of environmental permits was described and subsequently the monitoring of pollution and the reporting part.







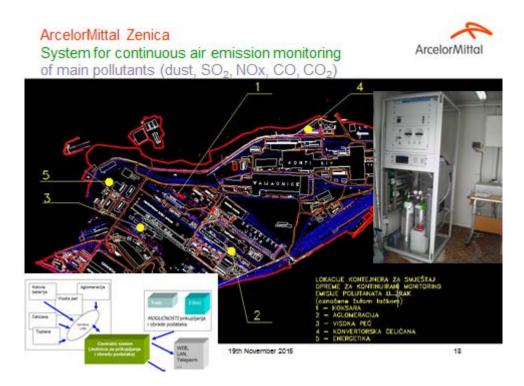
#### AM Zenica - Environmental Permits Status



Plant	Date of issuing of permit	Permitvalidity period
Coke plant	26/11/10	5 years
Sinter Plant	26/11/10	5 years
BlastFurnace	02/12/09	5 years
Steel Plant (BOF & EAF)	02/12/09	5 years
Rolling Mills	02/15/09	5 years
Power Plant	26/11/10	5 years

A detailed overview was given on the monitoring systems and various pollution control measures taken and planned for each of the sub units and facilities.

19th November 2015



- 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 following elements:
  - The Kemira Case (an example);

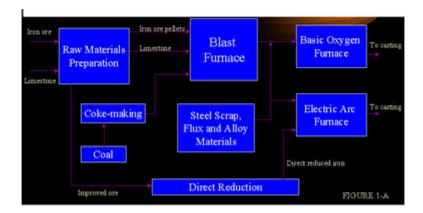






- BAT and BREF-NOTE regime;
- Steel Production;
- General BAT recommendations for steel works;
- BOF plant;
- EAF plant;
- BAT conclusions;
- The ArcelorMittal Zenica permit:
  - o Part of the whole complex How does it relate?
  - o Air emissions;
  - Water emissions.

# How is steel made II



For the group work it was decided to divide the participants in three groups, each of which had to define up to 5 questions in each of the groups in order to get an idea of the specific issues. The translated permit and selected information on BAT (BAT conclusions and BREF) were provided.

- 1. Air
- 2. Waste
- 3. Water

Formulated questions were respectively for the various groups:







#### Group no 1 - Air

- 1) What are the procedures in case monitored emissions are higher than Emission Limit Values?
- 2) Who defines the monitoring points?
- 3) When there is exceedance of emission limit values are the authorities informed?
- 4) What are the emergency procedures for situations under point 1) and 3)?
- 5) in case of complaints/damage will there be compensation for environmental damage.

#### Group no 2 - Waste

- 1) are by-products defined by national legislation?
- 2) Is there a licence for waste (dust/slag) disposal in landfills?
- 3) Where is ash disposed off?
- 4) Is slag being used in cement industry?
- 5) Is the landfill sufficient in size and well monitored?

#### Group no. 3 - Water

- 1) Are the monitoring periods defined in the permit?
- 2) Where are the discharge points (sewer/surface water)?
- 3) what are the major problems (which pollutants)?
- 4) It is noted that the allowed iron concentration in the permit is lower than 20 mg/l, whereas BAT requires less than 50 mg/l. What is the reason for this?
- 5) What are the reporting requirements?

#### Day 3 – Arcelor Mittal, Zenica, 19 November











The site visit started with a presentation by the Chief Technical Officer Mr. Gupta and a welcome by Ms. Tutza on behalf of the General Manager. The rest of the visit and the presentations were organized by Ms. Azra Sivo. The participants were guided by bus through the various parts of the plant, whereas a small sub-group with full personal protective equipment could visit the EAF (Electric Arc Furnace) and BOF (Basic Oxygen Furnace).

After the visit and lunch at the factory the visit was finalized with a Question and Answer sessions.

#### Group 1 - Air

- 1) In case exceedance occurs of emission limit values (for example dust) an internal notification procedure is taking place resulting in stopping of the system. If concentrations are higher because of maintenance works, the activities are temporarily stopped. The inspectorate (CA) is normally informed. There is a procedure that based on the quantities a financial amount is paid in a special fund. To be noted that a 96 h period is allowed to be above the ELV.
- 2) The specific spots for monitoring are decided by the accredited laboratory doing the measurements, also based on an overall plan
- 3) According to legislation the operator should compensate for the damage if it can be proved, i.e. to pay directly or to pay an annual amount to a special fund. No such case has happened however.

#### Group 2 - Waste

- 1) By- products are defined by legislation but construction industry, based on the construction standards, do not recognize/accept these by-products
- 2) Slag is used in cement industry
- 3) Fly-ash by hydro transport is send to the industrial waste landfill.
- 4) The landfill is owned for 2/3 by the municipality and for 1/3 by Arcelor. A protocol has been signed for management.

#### Group 3. - Water

- 1) Intake water from the river is sometimes more polluted that discharged water. There are 20 locations where monitoring takes place.
- 2) Main problems are the suspended solids which are sometimes above the limits. The water released in the river are always in line with the permitted levels.
- 3) The reason why iron levels are lower in the permit than the levels the BAT indicate, is that low levels can be reached because of the absorption of iron in sludge.









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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

The following summary of the training evaluation report, developed on the basis of analysis of the training questionnaires can be given. A number of 23 out of 25 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 17-19 November 2015, Sarajevo, Bosnia and Herzegovina
1.2	Facilitators name	As per agenda
1.3	Name and Surname of Participants (evaluators) optional	As per participants' list

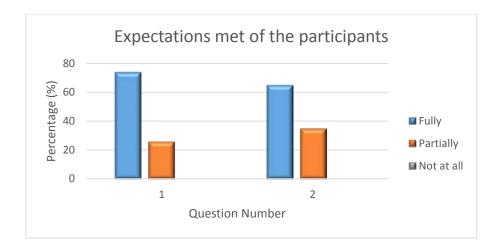
#### **Your Expectations**

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

My Expectations	My expectations were met		
	Fully	Partially	Not at all
<ol> <li>Filling gaps in knowledge (several IED, Inspection, management, permitting, cross cutting issues), general and specific.</li> </ol>	(17%)	(26%)	
<ol> <li>Practical experience of the new Member States and Candidate Countries.</li> </ol>	(65%)	(8%)	



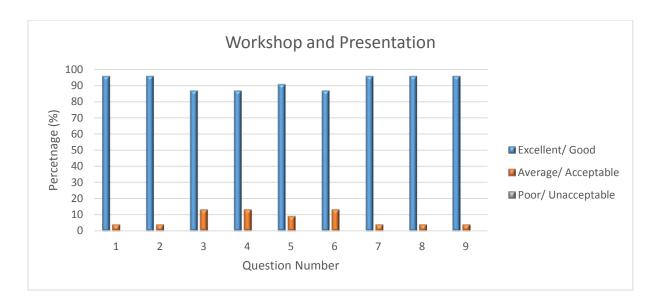




#### **Workshop and Presentation**

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

As	pect of Workshop	Excellent	Good	Average	Acceptable	Poor	Unaccept able
1.	The workshop achieved the objectives set	  (61%)	 (35%)	l (4%)			
2.	The quality of the workshop was of a high standard	           (74%)	(22%)	l (4%)			
3.	The content of the workshop was well suited to my level of understanding and experience	(61%)	(26%)	l (4%)	II (9%)		
4.	The practical work was relevant and informative	 (57%)	 (30%)	III (13%)			
5.	The workshop was interactive	(61%)	(30%)	II (9%)			
6.	Facilitators were well prepared and knowledgeable on the subject matter	        (65%)	(22%)	(13%)			
7.	The duration of this workshop was neither too long nor too short	(61%)	(35%)	l (4%)			
8.	The logistical arrangements (venue, refreshments, equipment) were satisfactory	(61%)	(35%)	l (4%)			
9.	Attending this workshop was time well spent	           (74%)	(22%)	l (4%)			



#### **Comments and suggestions**

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

#### **Workshop Sessions:**

- Ok;
- Can you organise training for IPPC writers only? Thanks;
- Good.

#### **Facilitators:**

- Ok;
- The facilitators in this workshop were very active, and all have given a good contribution in this workshop;
- I prefer more introductory words on the subjects, for example "E-PRTR is..." new form of reporting, diferences between PRTR and E-PRTR something like that;
- Good.

#### **Workshop level and content:**

- Ok;
- This workshop is very interesting for me and for my job, I gained new knowledge and will use it in the future, in my activities. I hope to have similar or other types of workshops in the future;
- Good.





# Day 1: Tuesday 17 November 2015

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

Co-Chairs: Mr. Ike van der Putte, Mr. Mladen Rudez, Ms. Azra Rogović-Grubić(TBC)

Start	Finish	Topic	Speaker	Sub topic/Content
08.30	08.45	Registration		
08.45	09.00	Opening	Mr. Mladen Rudez (ECRAN ECENA National Coordinator)	Welcome, introduction of trainers, introduction of participants
			Ike van der Putte (ECRAN –ECENA Coordinator)	
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 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
10.15	10.30	Experience of Bosnia and Herzegovina in Inspection Management	Ms. Alma Džanović, Federal inspector for environmental protection, Federal Directorate of Inspection affairs Mr. Dragan Nikolić, Republic inspector for environment in Republic Inspectorate	Brief description of the inspection system in Bosnia and Herzegovina and its development.



10.30	10.45	Coffee Break	Coffee Break			
10.45	11.30	Experiences in Turkey on elements of inspection management	Representative Turkey ( – Onder Gurpinar)	The role of environmental officers in industry in Turkey.		
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 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 6th training session further guidance is given on IED and Waste legislation interaction (part 3).		
12.30	13.30	Lunch Break				
13.30	14.30	IED-Monitoring and reporting	Mr. Ike van der Putte (ECRAN-ECENA coordinator)	Developments regarding the implementation of the IED/IPPC requirements with specific reference to monitoring and reporting (EPER/PRTR)		
14.30	15.30	IED – Monitoring and reporting	Ms. Jelena Manenica and Ms. Brigitte Mrvelj Čečatka Directorate for Inspection, Ministry of Environmental and Nature protection, Croatia	Developments in the implementation of IED requirements in Croatia with specific reference to reporting (PRTR) and monitoring.		
15.30	15.45	Coffee break				
15.45	16.45	Experience of ECENA beneficiaries in implementation IPPC/IED/PRTR	ECENA beneficiary representatives	Brief description of developments		
16.45	17.15	Questions and discussion	Participants			



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17.00	Closure	Ike van der Putte (ECRAN ECENA Coordinator)	
		Mr. Mladen Rudez (ECRAN ECENA National Coordinator)	

# Day 2: Wednesday 18 November 2015

Special	pecial subjects (SEVESO) and preparation for common inspection/site visit					
Start	Finish	Topic	Speaker	Sub topic/Content		
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 6th training session further attention is paid to the Site safety report with Hazard Identification/ Scenario selection/Consequence analysis and internal/external emergency plans		
09.30	10.30	Special subject SEVESO	Onder Gurpinar, Expert  Ministry of Environment and Urbanization, Ankara, Turkey	Experiences in Turkey with SEVESO installations		



10.30	10.45	Coffee Break			
10.45	12.30	Introductions on the factory to be visited	Invited Representative of the Factory Ms. Azra Sivro, Representative from Bosnia and Herzegovina	Presentation of the factory with permit (and conditions)  Exchange of experience from other ECENA members	
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

Visit to PILOT FACTORY - Arcelor Mittal Iron factory in ZENICA, Department of BOF/EAF 100 steel production					
8.00	9.30	Transport from the hotel to pilot site installation			
Visit to	Visit to PILOT FACTORY				
All part	All participants				
9.30	10.00	Preliminary discussion in the factory office – Speake Moderator: Ms.Azra Sivro are ArcelorMittal Zenica	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 chairma and reporter each. Chairman ha allocated specific responsibilitie to each member of the group	ns		
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><li>Conclusions of site visit</li><li>Suggested follow-up actions</li></ul>
17.30		Closure	





### **ANNEX II – Participants**

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First Name	Family Name	Institution Name	Country	Email
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First Name	Family Name	Institution Name	Country	Email
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		Protection		
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Kemal		Urbanization		
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**Human Dynamics Consortium** 



#### **ANNEX III – Presentations (under separate cover)**

Presentations can be downloaded from:

http://www.ecranetwork.org/Files/Workshop Presentations Common Inspection November 201 
5 Sarajevo.zip

