Event Report

EPPA

Regional Workshop on Industrial Emissions Directive in EPPA Countries

– Current status, new development

19-20 November, 2019

Ankara, Turkey

This Project is funded
by the European Union

The project implemented by the Consortium of NIRAS (lead)
and Umweltbundesamt GmbH

TABLE OF CONTENTS

ANNEXES

Annex 1: Agenda (provided as a separate document)
Annex 2: List of Participants (provided as a separate document)

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1 Introduction

The regional workshop

The regional workshop on Industrial Emissions Directive *in EPPA Countries – Current Status, New Developments* took place in Ankara, Turkey, on November 19-20. The workshop was organized in cooperation with TAIEX and under the EPPA project work programme, namely activity 4.4, "*Industrial Emissions Directive capacity building".*

The participants of the workshop came from the relevant authorities of the EPPA beneficiary countries, including permit writers, environmental inspectors and experts in EU acquis. More details are available in the list of participants (Annex 2).

Seeking to both pass knowledge and experience from EU Member States and the EU in general, the speakers chosen brought forward their countries' approach to the implementation of Industrial Emissions Directive (IED), namely Austria, Croatia and Spain. In addition, there were also speakers from EU Bodies and Energy Committee who provided latest developments in the implementation of IED, inspection and permitting processes together with an overview on requirements for Transitional National Plans.

The Industrial Emissions Directive

The pollutant emissions from industrial installations are regulated mainly by the Industrial Emissions Directive (IED) which was adopted on 24 November 2010. The Directive is based on a Commission proposal which originated from an extensive review of the policy, recasting seven previously existing directives (including in particular the IPPC Directive). The IED entered into force on 6 January 2011 and had to be transposed by Member States by 7 January 2013.

With IED, achieving a high level of protection of human health and the environment taken as a whole by reducing harmful industrial emissions across the EU, in particular through better application of Best Available Techniques (BAT) is aimed. Around 50,000 installations undertaking the industrial activities listed in Annex I of the IED are required to operate with a permit, granted by the authorities in the Member States. This permit should contain conditions set in compliance with IED principles and provisions.

The pillars that the IED is based are: (1) an integrated approach, (2) use of best available techniques, (3) flexibility, (4) inspections and (5) public participation.

2 Objectives of the training and expected results

The aim of the workshop was to provide advice and guidance on the Industrial Emissions Directive (Directive 2010/75/EU) and its implementation, and the workshop was built on the current state of the implementation in the EPPA countries.

3 Highlights from the workshop

3.1 Welcoming remarks and Introduction to the workshop

The workshop was opened by Mr. Adam Iwaszko with a brief introduction about the project and objective of the workshop. Following this introduction, Mr. Cengiz Baykara, Deputy General Director of DG European Union and Foreign Relations - Ministry of Environment and Urbanization Turkey, as the host country welcomed the participants and presented his pleasure to host representatives of EPPA countries. Importance of cooperation between EPPA countries and relevant past projects (RENA and ECRAN projects) were also highlighted in his speech.

Ms. Elif Özden, representative of EU Delegation to Turkey, stressed the importance of IED for prevention of environmental degradation and protection of human health. Around 50,000 industrial installations are currently being regulated by IED which sets minimum performance standards based on Best Available Techniques (BATs). Implementation of IED resulted in reduction of SO_2 and dust emissions and promotes resource efficiency. In respect to Turkey – EU relations; Turkey is a candidate country since the Helsinki Summit in December 1999 and the accession Negotiations were opened in 3 October 2005. Chapter 27: Environment was opened in December 2009. The financial assistance programme, Instrument for Pre-Accession, so called IPA covers technical assistance, institution building and acquis alignment as well as municipal infrastructure programme. Turkey has prepared and adopted a national approximation strategy for accession and industrial pollution was one of the costliest sectors representing 20 % of total cost of accession, with 14 billion Euro investment needs at the time document was prepared. During the IPA 1 period, Turkey has already implemented one project related to IPPC where a draft legislation was prepared and a new project is in pipeline regarding the transposition of IED in Turkey.

Introduction session was finalised by Mr. Christian Nagl (EPPA WG Air Quality Key Expert) with a presentation of the two-day workshop agenda.

3.2 Current status of the implementation of Industrial Emissions Directive in the EPPA countries

The representatives of the EPPA countries presented the current status of implementation of the IED, the existing legal arrangements, and the technical and implementation problems encountered regarding IED.

Albania

Albania set a procedure to apply, deliver and control the permitting process from the central to the local level by three levels of application; national (Ministry of Tourism and Environment and National Environment Agency), regional branches of National Environment Agency and the inspectorate and requirements of self-monitoring reports prepared by the operators. Ministry of Tourism is currently drafting a new law on Environmental Permits which will fill the existing gaps. Full implementation of IED will require a transitional period and there is a need to prepare Directive Specific Implementation Plans. Albania already achieved full transposition of Medium Combustion Plants (MCP) Directive and in the last recent years Albania is working on establishing procedures and measures for registration, monitoring and reporting from industrial installations together with preparation of Directive Specific Implementation Plans.

Bosnia and Herzegovina

Bosnia and Herzegovina is a pre-candidate country and prepared a strategy for approximation of EU legislation in 2014, which was approved in 2017. Action plans for environmental sector including IED and waste management were prepared. Through a two-year EU funded project, a Specific Implementation Plan for IED was prepared. There are 130 IPPC installations in Bosnia and Herzegovina. A format for reporting was and BAT for metal industry were prepared, which was considered as a priority sector. Legislation on Pollutant Release and Transfer Register (PRTR) was also prepared. The representative of Bosnia and Herzegovina mentioned the complexity of the IED which includes seven directives. Therefore, IED is not fully transposed in Bosnia and Herzegovina yet. A new environmental law has been prepared and after new rulebooks will prepared on EIA, IPPC Directive and SEVESO Directive. The major challenge of the implementation of the IED is lack of number of staff and capacity in all levels of implementation authorities. Bosnia and Herzegovina already identified and sent their training needs regarding capacity building in air quality.

Kosovo

Ministry of Environment and Spatial Planning has enforced the law on IPPC in 2009. During the implementation of this law, there was a need to change the existing legislation therefore Kosovo is now drafting a new law to transpose IED. Until 2019, 42 operators have applied for integrated environmental permit which consists of ferro-nickel, cement, paint, metal and clay blocks facilities. 11 permits have already been issued, 30 are under preparation.

Montenegro

Montenegro adopted a new law in March 2019 regarding implementation of IED and this law partially transposes IED. 15 rulebooks are being planned to be prepared in 2019 and 2020 to fully transpose IED. Specific Implementation Plan of IED was sent to EU Commission in March 2019 and comments are being awaited. This plan was prepared in cooperation with the operators and relevant institutions. Nature and Environment Protection Agency of Montenegro issues integrated environmental permits. Montenegro does not have any incineration and production of titanium oxides facilities. New regulation on mercury is also partially transposed and joint inspection control has recently been introduced in this new law. Montenegro currently performs an UNDP project to identify all operators subjected to IED and installations using Volatile Organic Compounds (VOCs). According to the previous law, around 10 IPPC installations were recognized and until now 5 IPPC permits (1 LCP, 1 power plant, 1 steel production plant and 2 landfills) were issued; 4 by Environmental Protection Agency and 1 by local authority. With the implementation of new law, all permits will be issued by Environmental Agency.

North Macedonia

Industrial pollution is covered by the Chapter 12 and 14 of Law on Environment which fully transposes IPPC Directive (2008). Until now 437 permits are issued at national level; which 198 of them issued by the Ministry and 247 of them are issued local level. North Macedonia implemented a twinning project and a draft law is being prepared to fully transpose IED. However, this draft has not been in force yet due to political issues. It is expected that in 1st quarter of 2020, this new draft will come into force.

Serbia

Chapter I and II of IED are partially transposed and relevant national legislation about IED is the Law on Integrated Prevention and Control of Environmental Pollution which was amended in 2015. Deadline for transposition of Chapter I and II is end of 2020. Deadlines for transposition of Chapter III, IV, V and VI are set as end of 2020, 2021, end of 2020 and 2021 respectively. A permitting system is established and there are 227 installations in six type of activities. Until 2019, 34 permits are issued and it is planned that competent authorities will issue all permits till the end of 2020. Main problems regarding permitting process are the lack of necessary data, financial problems of the operators to fulfil BAT requirements, changes of existing legislation, tight deadlines given in the legislation and the lack of administrative capacity. Draft Specific Implementation Plan was prepared which included technical, financial and socio-economic analysis of IPPC installations.

Turkey

Turkey has implemented a twinning project and a technical assistance (TA) project for IPPC Directive. In the EU funded project, a draft legislation was prepared for Chapter I and II. A Regulatory Impact Assessment and inventory was also prepared in the TA project. Based on the results of this project approximately 7,000 installations were included in the inventory and it is expected that this number has been increased as of 2019. The TA project has recommended to implement IPPC Directive for the existing installations via sectorial implementation calendar. Therefore, specific projects were performed for different sectors. In each sectorial project gap analysis and determination time and finance needed to fully harmonize BATs were studied. LCP Directive was studied by another EU funded project and currently there are 82 LCPs in Turkey. Through a national funded project, cement sector was investigated and there are 84 cement factories in Turkey. Pulp, paper and glass sector is being performed by Turkish-German

cooperation project and metal sector is being worked via a national funded project. Results of this study shows that there are around 3,000 factories in metal sector. In 2020, a new project will be commenced to cover waste sector and another IPA project will start in late 2019 regarding the IED Directive. The project aims to prepare National Action Plans for the existing plants and sectorial calendar for harmonization of the new plants. Sector specific Communiques will be prepared regarding BAT conclusions.

LCP and Waste Incineration is fully transposed and being implemented for many years. A project was also performed for VOC and similar sectorial calendar for implementation was recommended. Since there are no titanium dioxide plants in Turkey, no studies were performed in this subject.

Implementation of IED will be via central administration (Ministry of Environment and Urbanization) and it is expected to cover around 7,000 of Annex-1 facilities. There are 11,000 facilities lower than Annex-1 of the IPPC Directive limits and these facilities will be permitted by Provincial Directorates. Representative of Turkey concluded her speech by a detailed explanation of current permit regime.

3.3 Current activities regarding industrial emissions in the EU

The presentation introduced an overview of the IED Legislation, BAT conclusions, implementation support and evaluation process. BAT-based permitting has been applied for 25 years and 33 BAT reference documents were prepared. Emission levels for over 80 different pollutants are set. IED covers six different industrial sectors and there are around 50,000 installations in EU.
In Sevilla, the Joint Research Centre (JRC) of the European Commission manages the IED Bureaux. This process brings together experts from MS, NGOs and industry. The result of this process are BREF documents and BAT conclusions, the latter are legally binding documents.
2 new BAT documents will be published soon to cover food, drink & milk processing and waste incineration sectors. Currently 7 BREFs are being reviewed and in June 2020, a workshop will be organized how to prioritise BREFs. Regarding the implementation support, there is an on-going contract to review BREFs and current workstreams are emissions to water, compliance assessment and specific issues from BAT conclusions. In the scope of evaluation of IED, five criteria are defined and in the consultation period, public consultation and targeted survey was performed. A final stakeholder workshop will take place on 17 December 2019, which will be webstreamed[1]. There were 313 responses to open public consultation and 285 responses to targeted survey. Summary of the results of consultation is publicly available in EC web-site.[2] The evaluation report will be published in late 2019; the permitting process will be analysed in 2020.

3.4 Enforcement and inspection of the IED in Styria, Austria

The presentation started with the number of IPPC installations in Styria and legal structure in Austria regarding the implementation of IED. In Styria, issuing of permits and performing inspection is done by the same authority; the authority is represented by legal experts, who use the expertise and service of a pool of technical experts. Another authority is the so-called fining authority, which is in charge of setting fines in case of detected cases of non-compliance Inspectors, who are technical experts are working during permitting process and environmental inspections. In Styria, environmental inspections are coordinated by a specific department within the authority. The presentation gave an example of permitting for an installation for intensive rearing of poultry in Styria. Legal requirements for permitting and environmental inspections as well as technical requirements were provided in the presentation. Steps of environmental inspections in Styria case were explained in this session of the workshop.

[1] https://ee.ricardo.com/industrial-emissions-directive-final-stakeholder-workshop

[2] https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-4758971/public-consultation_en

3.5 Croatian experience with implementation of Art. 23 IED – system of planning environmental inspections and execution

The presentation included a brief overview of implementation of IED in the Republic of Croatia. There are two competent authorities for the implementation and enforcement of IED which are Ministry of Environment and Energy and State Inspectorate, Environmental Protection Inspection (EPI). IED was transposed in the Environmental Protection Act and Regulation on environmental permit. Croatia was supported by Twinning projects to implement the IED. EPI coordinates environmental inspections and provides the coordinator inspector who has several roles: coordinating line inspectors, informing operator, performing on-site visits, meeting and discussion with line inspectors after site visit, gathering reports and creating a consolidated report. Direct effects like air emissions, wastewater management, noise and indirect effects in combination with accident preventions have to be inspected during on-site visit. An inspection plan for all IED installations shall be set up and procedures for drawing up programme for routine environmental inspections shall be developed as an additional requirement from Article 23 of IED. Croatia started implementation of an Integrated Risk Assessment Method for prioritization of inspection controls of IED installations and waste management operators. The Inspection Programme should cover defined time period of maximum 1 year, list of installations, responsible coordinators and line inspectors and defined dates. There are 155 IED installations in Croatia and breakdown of these installations is presented by Croatia representative.

3.6 Implementing BAT Conclusions in Austria: Examples, challenges and opportunities

The presentation provided an overview of the implementation of the IED in national law, which had to be transposed in a series of national and provincial laws. For most activities permitting and inspection lies in the responsibility of the 9 federal provinces, for many pollutants or activities, general binding rules have been published in Austria. Permit conditions are based on these general binding rules, on expert judgement and specific BAT-conclusions. Giving burden to the operators, split of competencies, different approached between provinces and fragmented legislation are the main challenges in Austria. Another challenge is how to “translate” BAT-conclusions into permit conditions, when no specific indicators are given (“soft BAT”).

A very helpful source of information is the CIRCABC platform[3] provided by DG ENV, which includes an IED library and which gives (non-binding) guidelines to specific questions related to the implementation of the IED.
The presentation provided a description of various definitions and concepts of the IED such as “directly associated activities”, operator, installation and BAT conclusions.
Furthermore, the presentation summarized the challenges related to the energy transition in the Industrial sector (ie. reduction of energy consumption and switch to renewable energies) but also the positive effects of BAT in relation of meeting the reduction targets of the NEC-Directive. For the latter some examples were presented.

The representative of the Environment Agency also provided several options how operators and authorities could improve the implementation of IED.

3.7 Introduction to workshop day two

The second day of the workshop was chaired by Mr. Christian Nagl who explained a minor change in the agenda, which is an additional presentation by Mr. Peter Vajda from the Secretariat of the Energy Union. He also explained, that the presentation by Ms. Maria Valero Gil was erroneously deleted in the final agenda.

[3] Communication and Information Resource Centre for Administrations, Businesses and Citizens, https://circabc.europa.eu/ui/welcome

3.8 Implementation of industrial emissions legislation – the case of the Energy Community

The presentation gave an in-depth look at the environmental dimension of the Energy Community, content of the IED Directive, the MCP directive and activities of the Energy Community in the field of industrial emissions. The goals of the Energy Community are to support the creation of regional energy markets, the security of supply and sustainability of energy systems.

The presentation provided an overview how different industry related European Directives are implemented in the Acquis of the Energy Community. Chapter III and Annex V of the IED have to be implemented from 1.1.2018 for new plants and from 1.1.2028 for existing plants. The Large Combustion Plants Directive (which is not in force in the EU since 1.1.2016) has to be implemented from 1.1.2018, given the specificities of the Energy Community acquis. Several Contracting Parties are implementing National Emission Reduction Plans (NERP) which establish overall emission ceilings for LCPs at national level. The presentation explained also the opt-out mechanism (limited lifetime derogation) and the reporting requirements under the LCP Directive.

3.9 The Experience in Galicia, Spain – from IPPC Permit to IED Permit

The presentation offered the transposition of the IED, BAT Conclusions and permit update and application of IED Article 15(4). Regional authorities of Spain are responsible for issuing permits and Integrated Control and Pollution Law together with implementing regulation is the common framework of IED. The presentation described the main challenges for regional authorities, which are to identify the main activity in complex installations, as well as to implement BAT conclusions within 4 years.
IED allows MS to set less strict emission limit values under specific circumstances. In Spain, there is no formal procedure for granting derogations and guidance in place or forthcoming to assist this process. Derogation process is started by operator and includes updating permit and public consultation. The derogation permit is issued within the updated permit, which includes an annex showing the reasons for derogation.
Finally, the presentation provided several case studies for requesting details from the operator, applying for a derogation, evaluating the derogation, and deciding on this application.

3.10 Overview on Requirements for Transitional National Plans and available plans in Europe

The presentation provided an overview of the requirements for transitional national plans (TNP), which are one of four mechanisms to allow for a temporary exemption from ELV for some LCP. The transitional national plan should cover one or more of three pollutants: nitrogen oxides, sulphur dioxide and dust for the period from 1 January 2016 to 30 June 2020. For the gas turbines, only nitrogen oxides shall be covered. Transitional National Plan sets a ceiling for the maximum total annual emissions for all of the plants covered by the plan in accordance with the rules specified in the IED and Commission Decision 2012/115/EU. Transitional National Plan should contain list of all combustion plans fall under the plan, calculated contribution of each individual combustion plant to the emissions ceilings and table setting out the emission ceiling for each of the pollutants the plan covers.
The presentation provided an overview on compliance monitoring, remedial actions and reporting to the European Commission. In addition, it was highlighted that the TNP requires acceptance by the Commission prior to its implementation. The presentation showed which European Member States have implemented a TNP and the website[4], where these TNP and related documents can be found.
Finally, an example for a TNP from Lithuania was provided to the participants.

[4] https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/9f54e7e7-c224-4ad1-9f92-6179ebe64f97

3.11 Inspection follow up in the installations concerned and reporting. Transitional national plan for Croatia

The presentation included an example of environmental inspections for a glass production facility and a new waste gas purification facility. The presentation also showed examples for the Croatian annual inspection working plan as well as for the reporting scheme.

Although Croatia has adopted IED, a Transitional National Plan was also implemented. This plan has been drawn up in accordance with the requirements Article 32 of Directive 2010/75/EU. Croatia has negotiated with the EC a transitional period for the full application of Article 4 (1) and (3) of Directive 20011/80/EC. Two large combustion plants were subject to the Transitional National Plan.

The presentation also provided an overview industrial activities in Croatia as well as examples for emission reductions in various installations.

The priority actions of the Ministry of Environment for 2019 are reviewing permits to ensure their compliance with newly adopted BAT conclusions, strengthening control and enforcement to ensure compliance with the BAT conclusions and addressing the challenge implementing BAT in the waste treatment sector.

3.12 Working groups based on topics raised in previous sessions

Following the presentations, Mr. Christian Nagl proposed four working groups on following topics:

1. Main challenges for the implementation of the IED / LCP in EPPA countries
2. Interrelation with decarbonisation and circular economy
3. Ways to improve inspection processes
4. Harmonization of derogation periods (NERP, TNP, RLV, BAT conclusions)

Some example of questions to be discussed in each working group was shared by the Chairman and each group was asked to present their outcomes after internal discussion session. Participants selected to be involved in two topics; Nr.1 and Nr.3.

The speaker of **Working Group 1** (discussed item Nr.1), explained the main challenges for the implementation of IED as below:

- Various administrative levels are responsible for implementing the IED,
- The regulations are complex and expensive to implement,
- There are uncertainties in the determination of installation owner, i.e. extensive rearing of poultry facilities.

Lessons learnt that can be shared between EPPA countries in working group 1 can be summarized as:

- Sharing already prepared checklist, guidelines for the implementation of IED among EPPA countries,
- Sharing the permit content within the region,
- Permitting and inspection cycles.

Proposed topics for further workshops where:

- Relationship between NERPs, TNPs and the flexibility mechanisms
- Implementation of BAT conclusions
- Reporting obligations to EIONET
- Reporting of operators
- Reporting under PRTR and PRTR implementation
- Identification and inspection of facilities using VOC.

Speaker of **Working Group 2** (discussed item Nr.3) listed obstacles to improve inspection processes and how to overcome these obstacles as follow:

- Lack of number of inspectors and human capacity in administrations. To overcome this obstacle, number of inspectors should be increased as well as efficiency and effectiveness of inspectors,
- Specialized trainings for inspectors how to apply BAT conclusions in the permits and how the inspectors can inspect the installation by applying BAT conclusion,
- Lack of technical equipment for the inspections
- Lack of Cooperation between inspectors and permit writers. To overcome this challenge, cooperation between the two should be strengthened.

Sharing the experiences of both permit writers and inspectors between EPPA countries may result finding a way to increase cooperation between these two authorities.

4 Conclusions

The workshop succeeded in increasing the knowledge of IED, environmental permitting and inspection processes, derogations to permit procedure and preparation of transitional national plans.

The workshop's main outputs were:

- Enhanced understanding of the topic, policy and legislation, challenges and current practices related to IED,
- Cooperation between the beneficiaries strengthened permit writing and environmental inspections,

5 Evaluation

The participants were asked to evaluate the workshop *post-factum*. They received a paper format questionnaire at the end, consisting of six questions along two pages, in order to assess the impact of the work conducted during the workshop, in light of the EPPA project objectives. Later, the participants also filled in a second questionnaire circulated electronically by TAIEX, asking them to provide feedback on the technical and logistical quality of the workshop. This report presents the results of both evaluations.

5.1 The EPPA impact evaluation

Twenty-three participants filled in the paper-based questionnaire aiming to assess the impact of the workshop. The sample offers enough coverage of all project beneficiaries, as it can be seen from the following table. The questionnaire is composed of six questions, the first five looking at the specific impacts of the workshop, and one asking the respondents to offer their opinion on their country's priorities and suggestions for future EPPA events.

The first five questions are “agree/disagree” questions, in a scale from “strongly disagree” to “strongly agree”. They also include a space allowing the respondents to explain or offer more information about their level of agreement. The final question is of open-ended type.

Country	Nr of answers
Albania	0
Bosnia and Herzegovina	3
Kosovo	4
Montenegro	4
North Macedonia	4
Serbia	3
Turkey	4
Undisclosed	1
Total	23

Table 1 - Answers to EPPA evaluation questionnaire per country

The results of each question are presented here, one by one.

Question 1 - The event agenda, and corresponding outcomes, were relevant to my country’s priorities and needs in the given subject

The majority of participants agreed with the question (57%), while a significant number (39%) strongly agreed. Only one response was “I am neutral”. There were no negative answers. It can be concluded that the programme offered in the workshop was well received by the participants and the outcomes achieved, as described above, were to the satisfaction of the entire group.

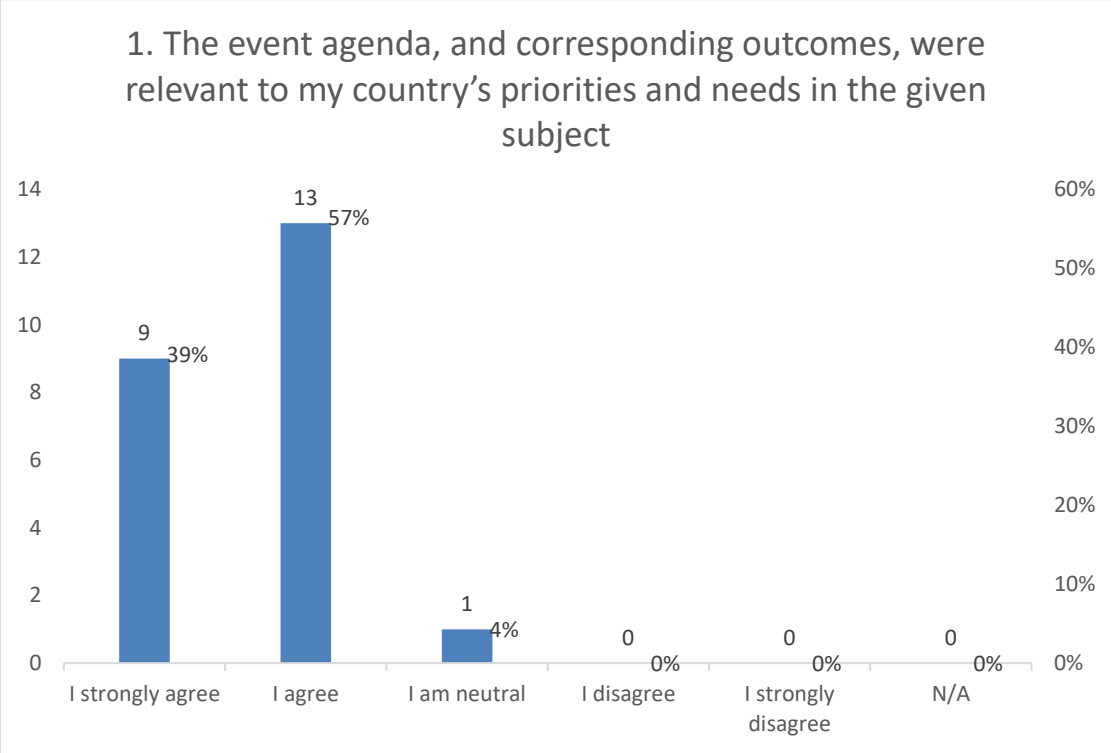

Figure 1 - Agenda and outcomes relevance

Question 2 - My work performance will benefit from the event in terms of knowledge/expertise gained, contacts established, best practices, others.

As in question 1, the responses were overwhelmingly positive, with 52% agreeing and 43% strongly agreeing. Only one response was "I am neutral". It is fair to conclude that the outcomes of the workshop, for which the participants were satisfied with, will indeed contribute to improve the substantive outputs of the administrations present regarding implementation of IED.

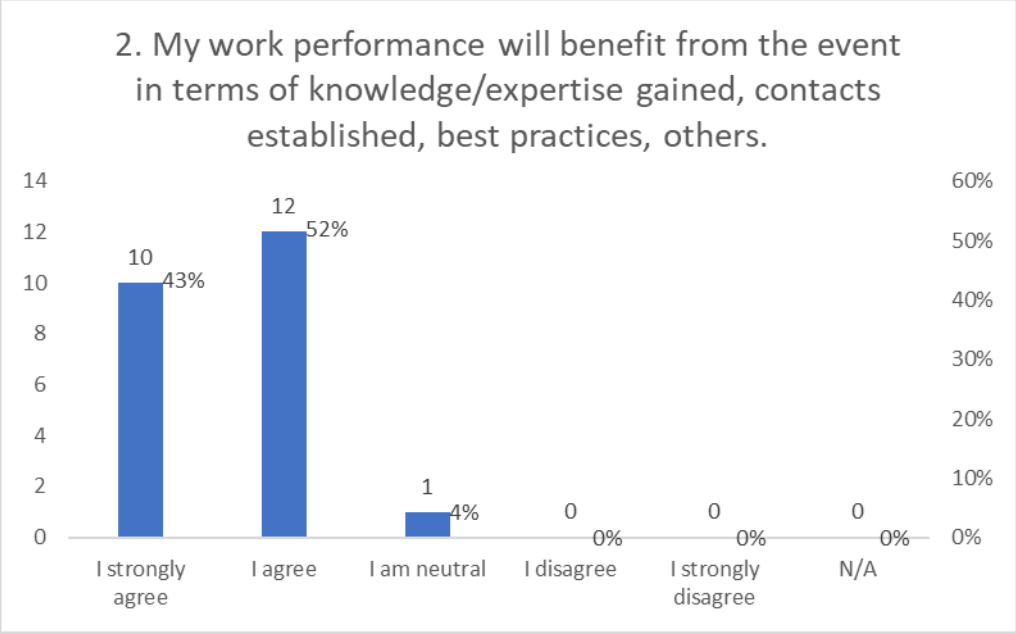

Figure 2 - Better work performance

Question 3 - This event contributed to enhanced regional cooperation in the EU candidate countries and potential candidates in the implementation of the EU environmental acquis

Regarding the contribution of the workshop towards better regional cooperation, all of respondents were satisfied (52% strongly agreed, 48% agreed).

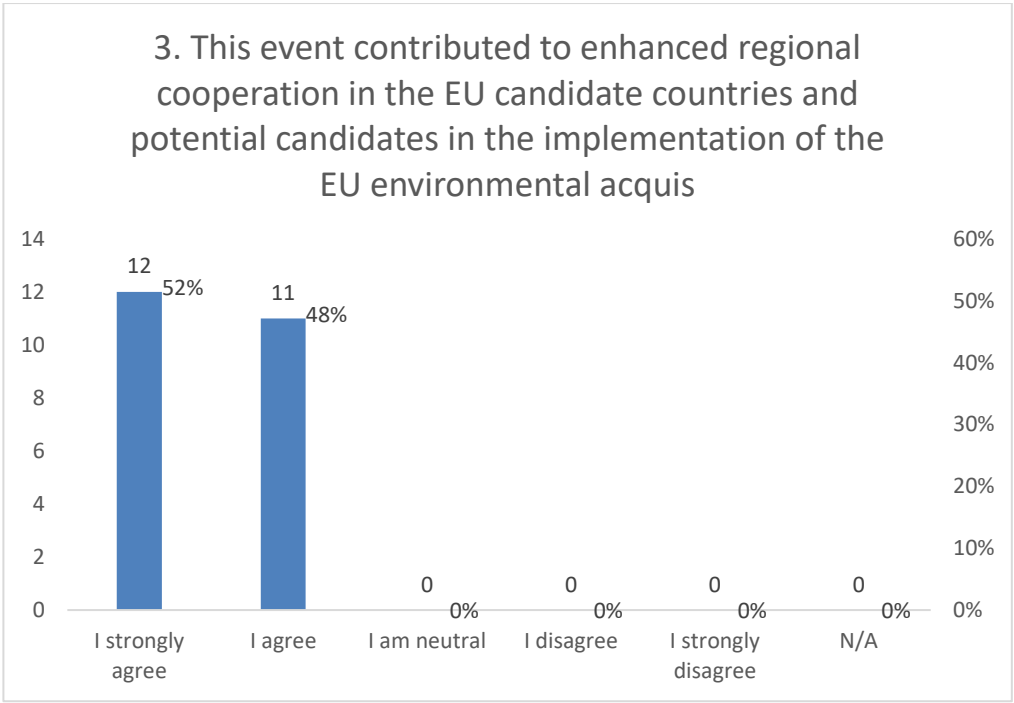

Figure 3 - Regional cooperation

Question 4 - This event contributed to increased alignment of my country's legislation with the EU environmental acquis, and its enforcement.

Majority of the respondents agreed that the workshop achieved a high, perceived contribution to the beneficiaries' alignment efforts with the EU acquis. Ninety-one percent of respondents strongly agreed or agreed with the question.

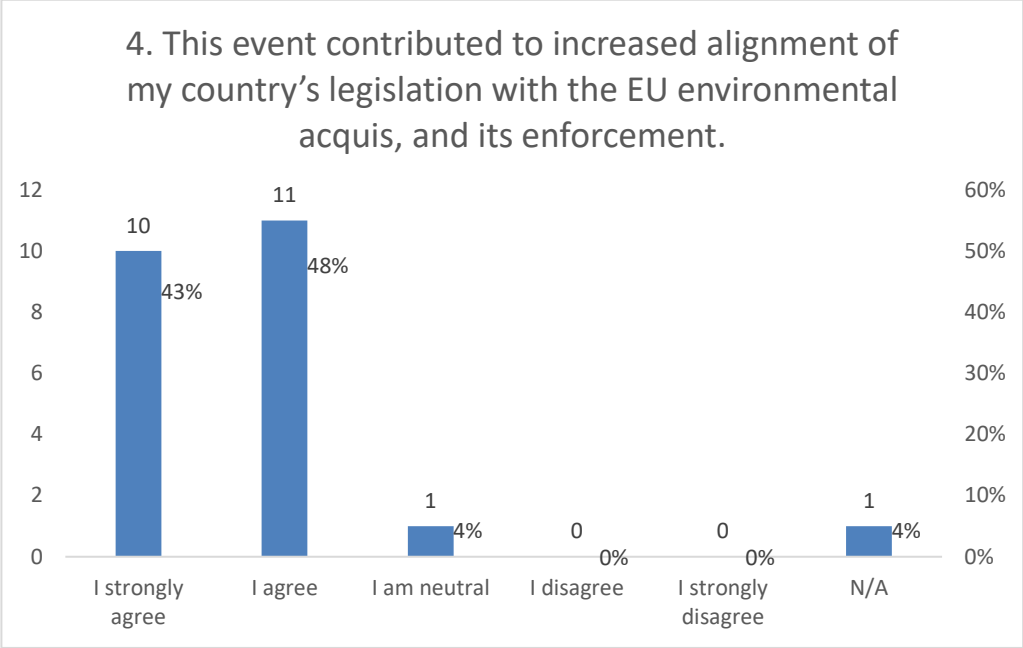

Figure 4 - Alignment with the EU acquis

Question 5 - This event contributed to increased capacity and technical knowledge of my organization to deal with transboundary environmental issues, in line with EU acquis

83 % of the respondents strongly agreed or agreed that the workshop increased their home institution capacity to deal with implementation of IED. Unlike the other questions 9 % of the respondents stated that they are neutral and only 1 one respondents disagree with the proposed statement.

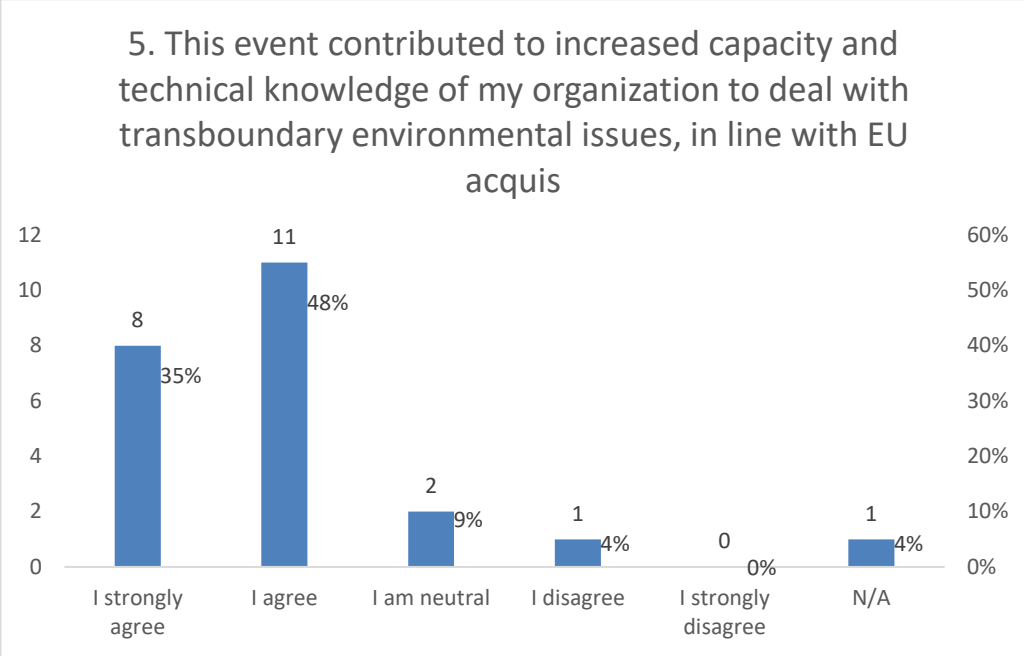

Figure 5 – Capacity for transboundary issues

Question 6 - Do you have general recommendations, for the future, regarding the topic and how best to address your country's needs?

The respondents had several recommendations for future workshop topics and other training needs:

1. Further assistance and advise on how to develop THP and to harmonize IPPC permit with new BATs requirements in the country. i.e. harmonization of derogation periods. The best way to address our country need would be to organize expert mission or study visit to the specific country issues.
2. Experts' missions to countries and site visit to installations especially help in setting ELV for the installation who are under NERP. All of those examples from EU countries are very much helpful.
3. More practical implementations and challenges implementing the IED. Implementation of IED with VOC solvents. Mechanism for fees applying IED permits. Financial instrument for implementation.
4. Trainings on inspections.
5. Trainings about SEA Directive and relation with EIA Directive., i.e. cross border context. And discussions on relation to IED Directive Annex I and, IPPC Directive and PRTR Protocol (reporting, data validation, evaluation)

5.2 The TAIEX technical and logistical evaluation

To be completed once TAIEX evaluation data is made available.

6 Annexes

6.1 Annex 1: Agenda of the Workshop

6.2 Annex 2: List of Participants

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