

**Strengthening the administrative  
capacities on central and local level  
for transposition and implementing  
new Industrial Emissions Directive  
2010/75/EU**

**Recommendations and way forward**

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The project is funded  
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# What are the essential requirements of Industrial Emission Directive?

- Prevention of pollution and, if not feasible, reduction, as well as soil protection
- Permit is required for operation the installation and needs to contain permit conditions including emission limit values (ELVs) for all relevant pollutants, which are to be based on the use of the best available techniques (BAT)
- Enforcement supported by inspections
- Access to information and public participation

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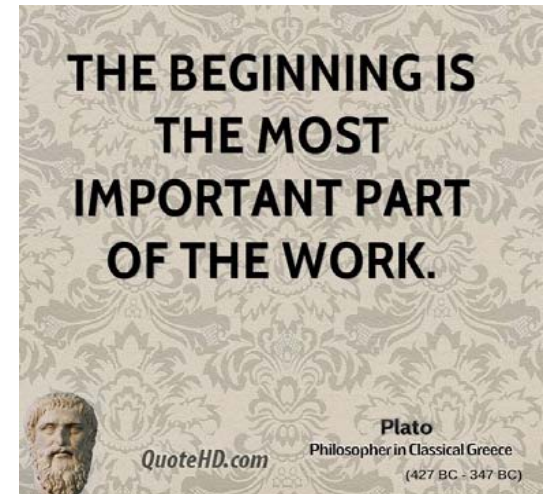


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The finalised Twinning Project is only the first step in the process of the implementation of the Industrial Emission Directive



Still a lot to be done by the Administrative Authorities and Policy Makers in Macedonia

=> So please continue with the work and keep in mind that the coordination, cooperation, communication and joint work will lead you to the best possible results

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# Institutional recommendations - I

- Increase number of staff of IPPC unit by at least 2-3 FTEs and include one legal expert (administrative law)
- Develop a database/IT system to manage information related to the IED implementation process. This system should also link with information provided in other departments
- Working procedures for coordination and cooperation with all relevant departments and units involved in the IED implementation process, with clear roles and responsibilities
- Establish a Memorandum of Understanding (MoU) in conjunction with the State Inspectorate of Environment with detailed description of involvement of each party to ensure that all draft permits are reviewed, assessed and responded to.



# Institutional recommendations - II

- The IPPC Unit in cooperation with the EIA Unit should consider preparing guidance of what constitutes a substantial change to an installation in the Macedonian context.
- New facilities should be required (in most instances) to meet the requirements of BREF or BAT conclusions (where they exist) and AEL's as opposed to national limits.
- National legislation should be amended to facilitate the application of EU BAT Conclusions and BREF with regards to drafting A permits
- Waste activities currently listed under the B permit regime which fall under Annex 1 of the Industrial Emission Directive should be reclassified/reassigned to ensure they are permitted as A activities



## Institutional recommendations - III

- The IPPC Unit should arrange formal meetings, internally within MoEPP, with other departments/units involved with or responsibility for permitting matters.
- MoEPP should examine the most effective channels through which information is circulated. This may take the form of newsletters and emails briefings etc.
- Provide training to LSG staff to undertake environmental assessments of integrated environmental B permits.
- MoEPP as the primary national level authority should take the lead and ensure their cooperation and coordination with LSG level having particular regard to promoting the permitting of B activities



# Legal recommendations - I

- Scope of application and permit as well as procedure should be regulated by the law
- B-permits and B-procedure should be relieved from unnecessary burden and adjusted to the scale of activities in question
- Translation of BAT documents without adaptations and introducing them into the MK legal system through by-law
- Transitional periods suggestion

2 years for entry into force for new law

6 months when new BATc published in EU

4 years until permit update

**ABSOLUTE MINIMUM: 6.5 years, around 8-10 for most installations**



# Legal recommendations - II

- Stricter ELVs due to necessity of compliance with environmental quality standards
- Less strict ELVs in certain cases if disproportionately higher costs compared to the environmental benefits
- An already issued integrated permits and adjustment permits stay in force
- Applications before entry into force of the new law: Law on Environment applies





# Recommendations – permitting I

- ❑ Better coordination between the involved authorities would improve the quality of the final permit and help to ensure a higher level of protection of the environment
- ❑ Competent authority to perform an analysis of the different sources of dust in the region to identify and characterize their contributions and design a plan to improve the air quality in the area through a set of measures approaching all the sectors involved



# Recommendations – permitting II

- Check the urbanistic situation from the beginning of the process to see if there is any kind of incompatibility regarding the use of the soil in the location
- Authority should ask the operator to update all the information before permit update takes place
- Guarantee of coherence between the IED permits issued by the IPPC unit and the sectoral permits issued by other units => coordination and fluid communication is needed



# Recommendations under Component 4 – Institutional Assessment

- IPPC Permitting Unit needs more means to carry out their work efficiently. Computers are outdated and no specific software is available.
- It is necessary to improve coordination between different departments and work areas in order to search for synergies and optimization of equipment and human resources available.
- It would be very useful that the laboratory unit might become a central laboratory of environment, in order to support all MoEPP areas that require it.
- After visiting the air quality stations located in Skopje city, it is considered essential to change many of the existing analyzers and carry out a profound renewal of the network.

# Recommendations under Component 4 - Institutional Assessment

- ❑ Having material means is important, but it is necessary to emphasize that the main resource in order to comply with the IED is the staff.
- ❑ Therefore, in the future it is recommended to continue training the staff and motivating them to keep update their knowledge, taking into account technical developments, legislation changes, publication of new BREF documents, etc.



Ви благодарам за  
вниманието!

Thank you for your attention!

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