



Ministry of Agriculture and Environmental Protection
Republic of Serbia

Challenges faced by the Republic of Serbia with regard to implementation of IPPC requirements

Legal framework on IPPC

The Law on IPPC (2004)

- Regulation on type of activities and installations to which integrated permits are issued (2005) transposing Annex I of IPPC directive
- Regulation on criteria for determination of best available techniques, for application of quality standards, as well as for determination of emission limit values in integrated permit (2005) transposing Annex III and IV of the IPPC directive
- Rulebook on content, appearance and method of filling in the application for integrated permit (2006) implementing Article 6 of IPPC Directive
- Rulebook on content and appearance of integrated permit (2006) implementing Article 6 of IPPC Directive



By-laws important for the implementation of the IPPC Directive:

- Regulation on content of the programme of measures for adjustment of operation of installations or activity to comply with prescribed conditions (2005);
- Rulebook on content and method of maintenance of register of issued integrated permits (2005);
- Regulation on determination of the Schedule for the submission of applications for integrated permit (2008);

Legal framework on IPPC

- The Law on IPPC (2004)

Obligations:

- Existing installations must obtain a permit **by 2015 at the latest**
- New installations shall not commence the operation before the permit has been obtained

- Regulation on determination of the Schedule for the submission of applications for integrated permit (2008)



defined deadline for submission of applications:
December 2009 - March 2014

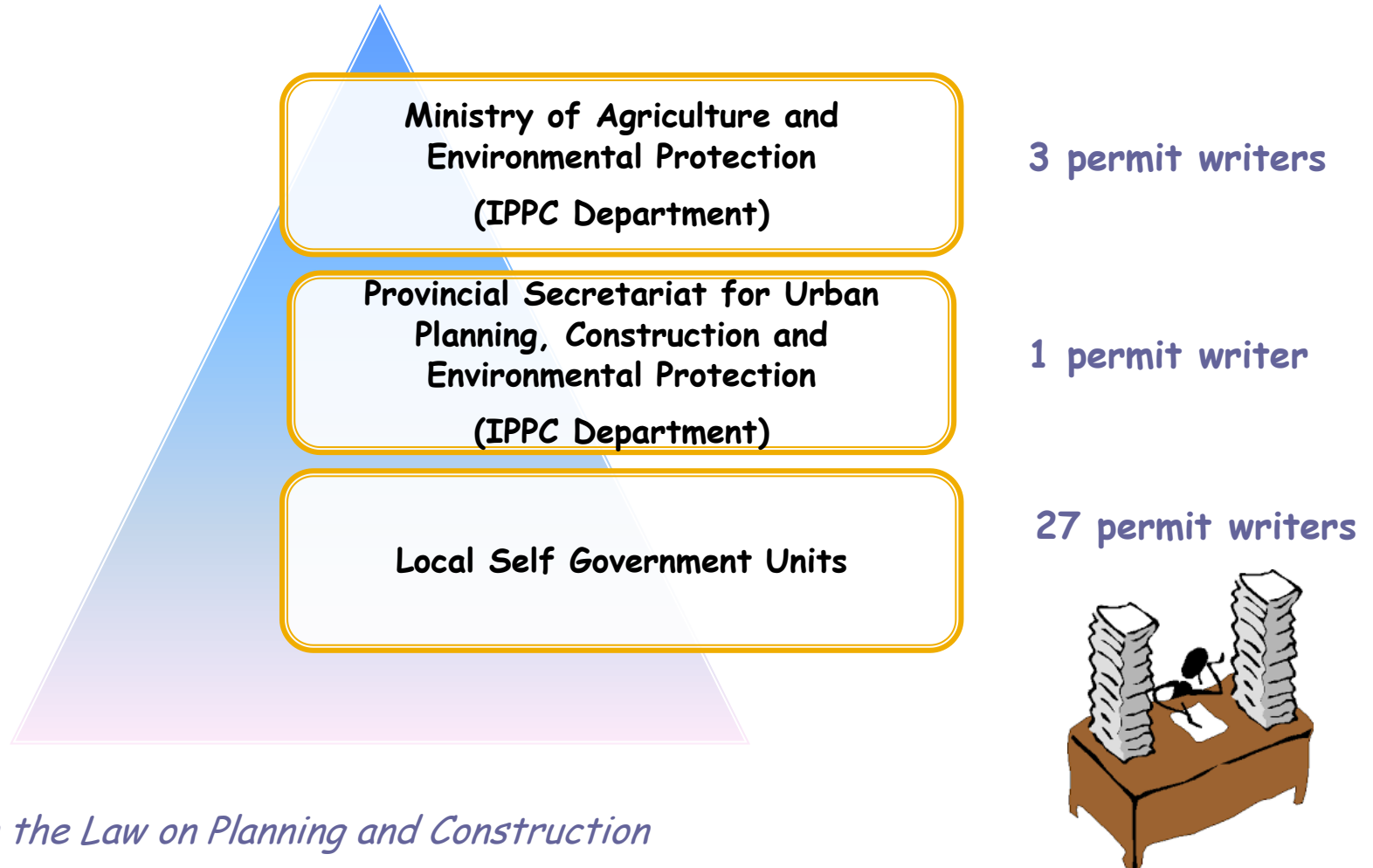


Until 2009, no applications! → time frame for issuing the IPPC permits was limited to 5 years

In 2015, amendments of the Law on IPPC → deadline for issuing permits extended until 31st December 2020

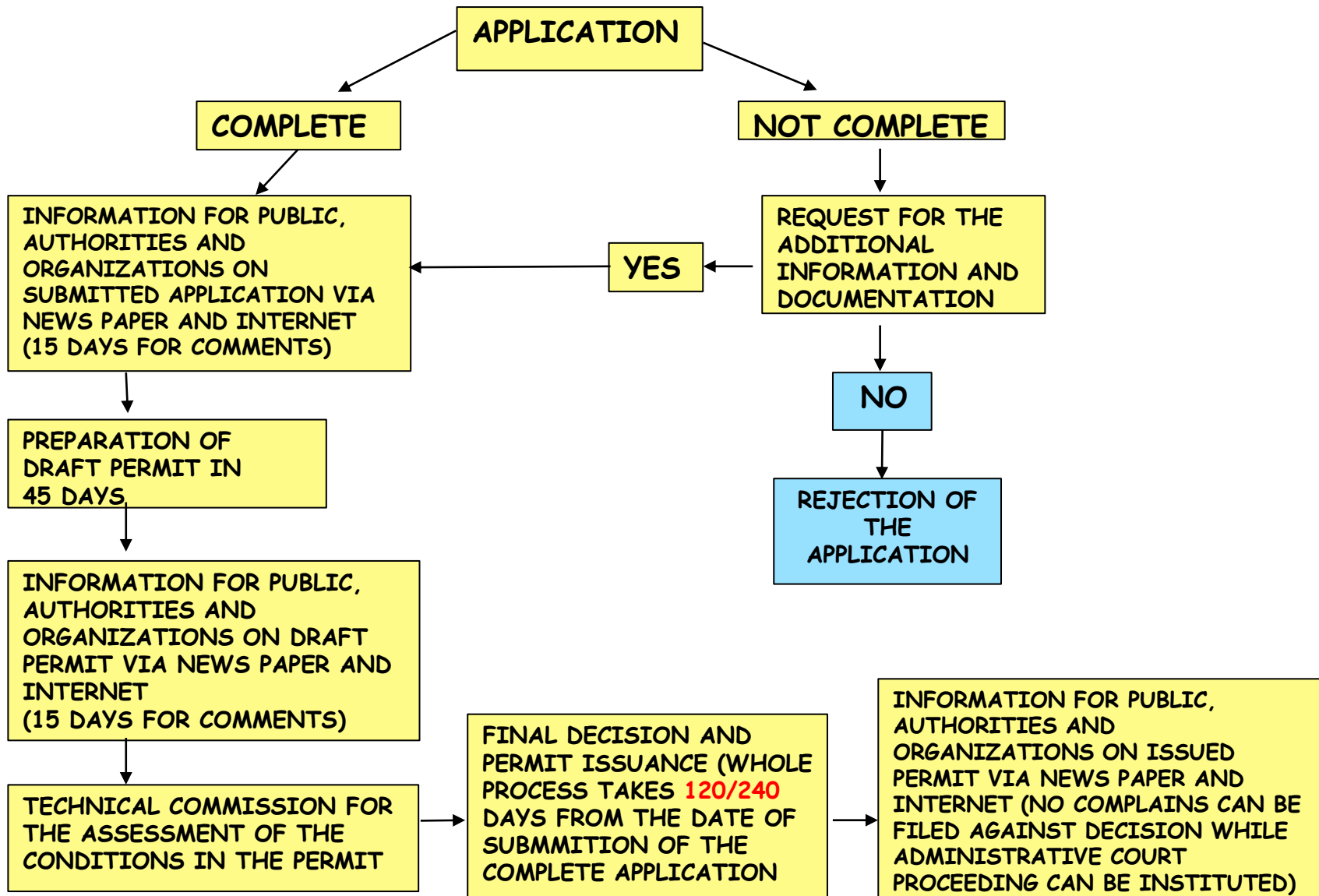
Institutional framework

3 levels of competence for issuing IPPC permits*



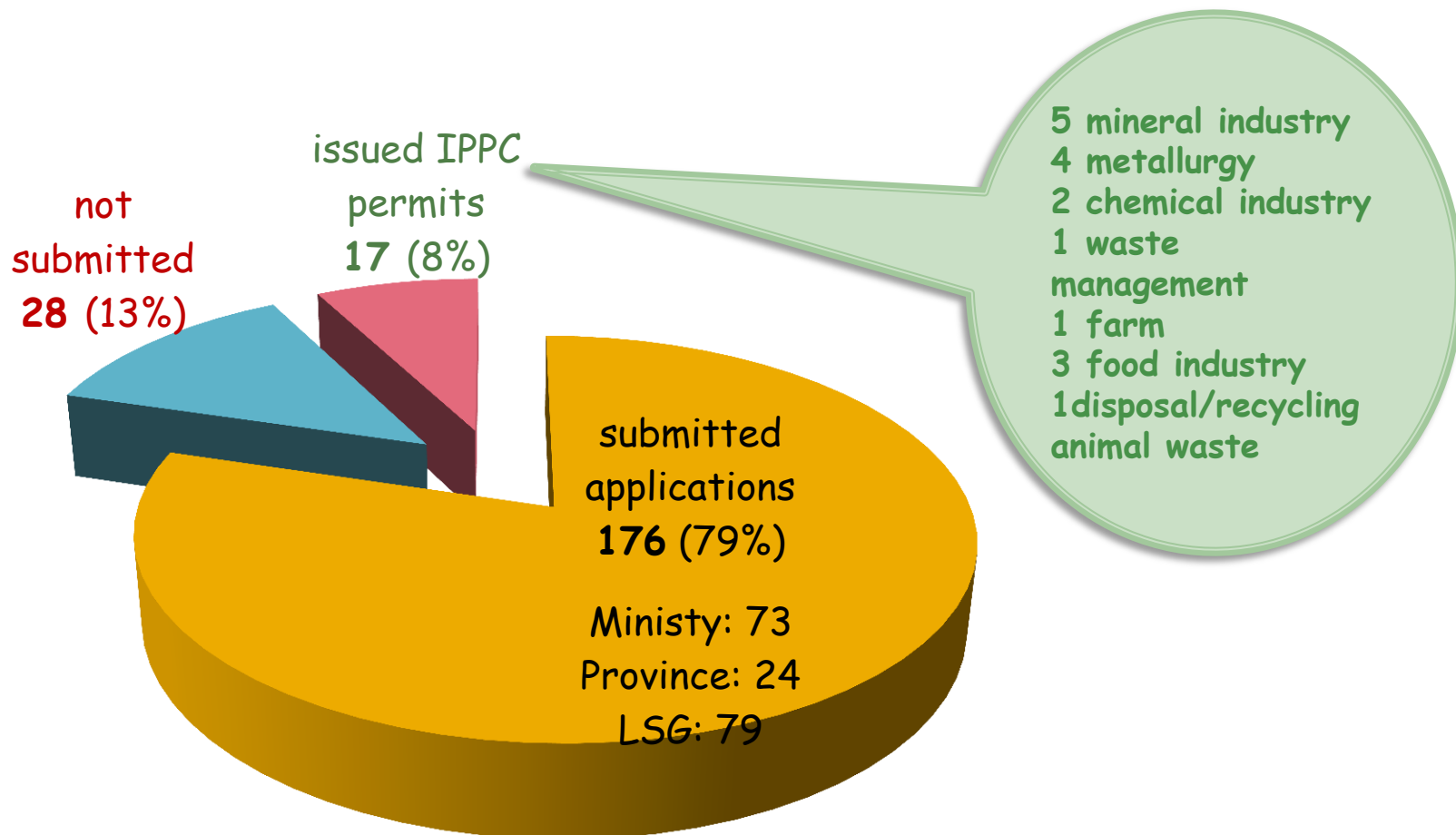
**based on the Law on Planning and Construction*

Procedure for issuing integrated permits



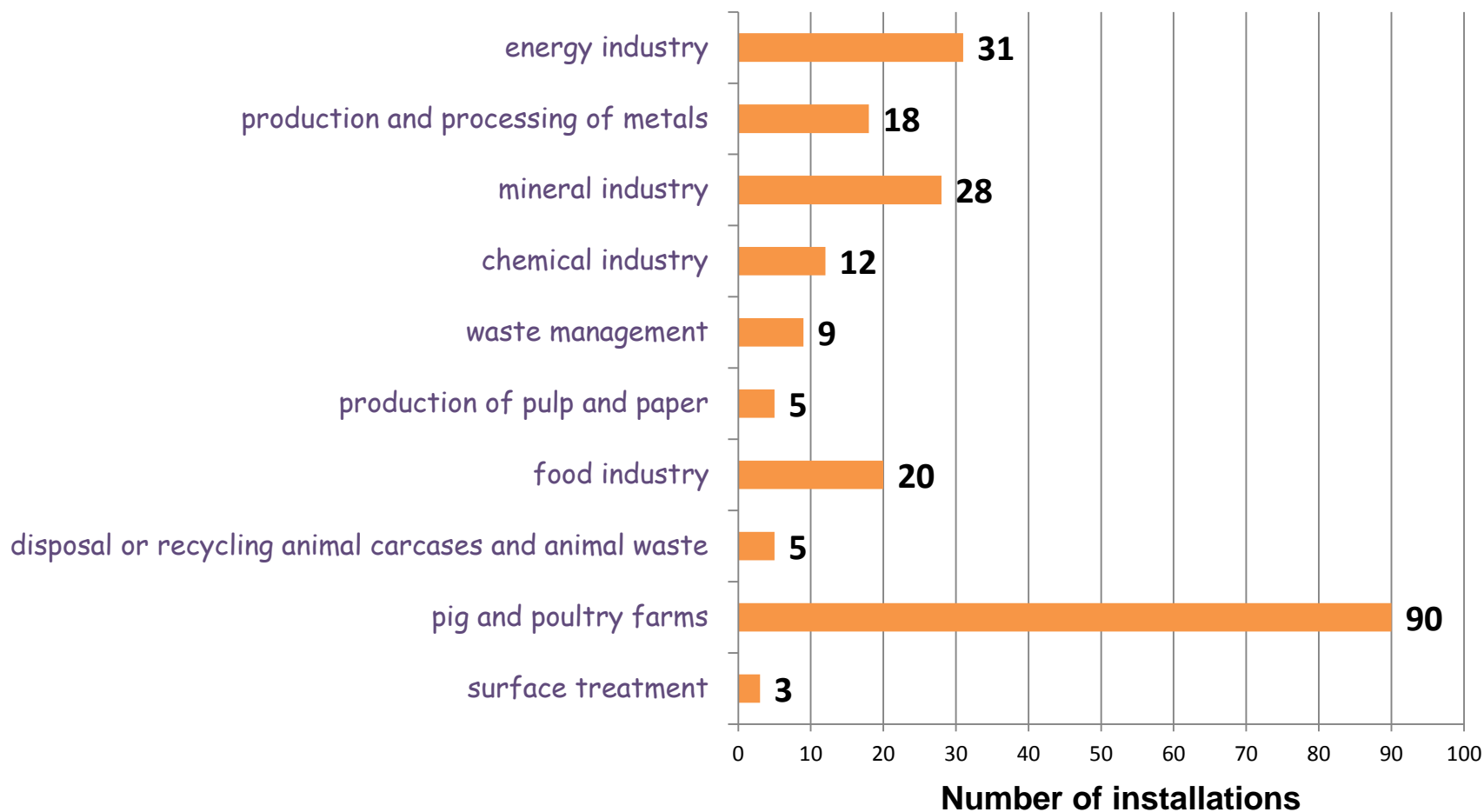
Current status of implementation

- Total number of IPPC installations in Serbia is **221**



Current status of implementation

Distribution per activities



What affects the slow implementation?

- In May 2009 → set of environmental laws (air, waste management, chemicals, biocides, noise,...) and subsequently by-laws, have been adopted → directly affected the implementation of IPPC Law
- Deadline set by IPPC Law for issuing all IPPC permits for existing installations was *unrealistic*
- Insufficient number of employees at all levels dealing with this issue
- LSG doesn't have capacity to deal with IPPC permits, they usually forward applications to the Ministry for further processing
- Insufficient environmental awareness among the operators
- Still large number of incomplete applications (documentation missing: usage and water permits, program of measures to comply with BAT)



Current activities to strengthen the implementation



“Law enforcement in the field of industrial pollution control (IPPC)”

The overall objective of this EU-funded project is to assist the Ministry of Environmental Protection in the process of implementation of the environmental legislation on the IPPC/IED

<http://www.ippcserbia.org/eng/home.html>



“Further Implementation of the IPPC/IE Directive in the Intensive Rearing of Poultry and Pigs”

The project will support 10 selected operators in preparation of integrated permits applications and other relevant documentation, and 10 LSGs in preparation of draft permits



<http://www.ippcfarms.org/en/>

Main conclusions and further efforts

- Period of 5 years for issuing all IPPC permits for the existing installations was too short
- Limited administrative capacities
- Training for representatives of LSGs and environmental inspection is necessary
- Further improvement of the legal framework in accordance with IED
- Main contributors to SO₂, NO_x and dust emissions are point sources from Energy sector which require significant financial investments
- The existing IPPC installations will need a range of reconstructions to harmonise their operation with BAT
- Assessment of compliance with BAT requirements will be possible after completing permitting process by majority of existing installations



Thank you

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