

III. Template to facilitate the submission of examples/good practices of strategies, policies and measures employed to implement obligations under any of the Protocols to the Convention

<p>Country:</p> <p>Finland</p>	<p>Sector:</p> <p><i>Industrial and other activities which are subject to environmental permitting process by national legislation.</i></p>
<p>Type of strategy, policy or measure:</p> <p><i>Registration procedure instead of environmental permitting procedure</i></p>	<p>Level:</p> <p><i>Registration has been adopted as part of the Environmental Protection Act (86/2000, replaced by 527/2014). Registration applies to activities which fall under the competence of municipal authorities.</i></p>
<p>What is the main objective of the strategy, policy or measure? When has it been implemented/or will be implemented?</p> <p><i>The main objective is to reduce the administrative burden of municipal authorities and simplify the permitting process but also streamline the environmental protection requirements for group of activities whose environmental impacts are minor by issuing general binding rules.</i></p> <p><i>The regulations on registration came into effect in 2010. Registration is applicable for activities for which legally binding environmental protection requirements have been issued by a Government Decree. It applies e.g. for fuel distribution stations with a total fuel tank volume of at least 10 m³ and combustion plants with rated thermal input of at least 5 MW to less than 50 MW for which environmental protection requirements as general binding rules has been approved. It has been applied for new activities since June 2010. A transition period of 8 or 10 years has been adopted for existing activities.</i></p> <p><i>Registration is a pure notification submitted to the municipal environmental protection authority for registration into the environmental protection database. The notification shall be made no later than 90 days before the operation begins. The municipal authority checks the conditions for registration, registers the activity in the database and informs the operator. No decision is made in the registration procedure.</i></p>	
<p>Background and driving forces:</p> <p><i>Before 2010 around 21 000 activities or installations needed environmental permits of which less than 10 percent required permit on the basis of European Union legislation. Around 7000 activities were permitted by state authorities and 14 000 by municipal authorities. The driving forces were to lighten and simplify the permitting process, reduce the workload of permit authorities (administrative burden) and of operators and if possible unify/harmonize the environmental protection requirements of certain activities. It was estimated that registration with general binding rules would not weaken the level of environmental protection.</i></p> <p><i>Based on studies carried out in Finland the registration seemed to be applicable if the environmental</i></p>	

requirements as general binding rules are issued by a government decree to a sector where

- *the total number of plants is big,*
- *the environmental impacts are minor,*
- *the individual permit requirements are similar and*
- *standardised techniques are implemented or used in the sector.*

Description of the strategy, policy or measure:

The basis for registration is that the activity complies with the general binding rules. The registration applies to following activities for which general binding rules have been issued :

- 1) *fuel distribution stations; 577 of the 1 800 petrol distribution stations have already been registered*
- 2) *combustion plants, with a rated thermal input of least 5 but less than 50 megawatts, 197 of the 600 plants have been registered during the first 6 years*
- 3) *certain solvent using activities where the solvent consumption is at most 10 tonnes/a; 130 activities have been registered and*
- 4) *asphalt mixing plants, 100 have been registered during the first 6 years.*

The requirements to comply with are included in the general binding rules. Depending on the sector they cover measures to reduce emissions to air, to protect soil, noise abatement, technical requirements and how to deal with fuel storages, waste and waste waters. The operator reports annually to the municipal authority on its operation and how it complies with environmental requirements. The required annual information is in detail expressed in the general binding rules relevant for that sector. If the operator does not comply with the requirements the supervisory authority asks for clarification and urges the operator to take action for reaching compliance.

Costs, Funding and Revenue allocation:

No cost estimates have been provided. By the registration process the workload of municipal authorities decreases compared to permitting. It has been estimated that the time used for registration is from 25 to 30 % from that time used for permitting depending on sector. The costs for operators seem to be rising due to the implementation of harmonized and in many cases stricter requirements in spite of lighter registration process and registration fee.

It is estimated that by registration the number of plants requiring permits issued by municipal authorities (14 000) is reduced by 3000.

Effect and impacts on air pollution abatement:

The positive effects are that the environmental requirements have been harmonised through general binding rules. Environmental impacts could be seen as reduced emissions to air and improved local air quality. Target is also to prevent groundwater and soil pollution. These rules depending on the sector cover measures to reduce emissions to air, to protect soil, noise abatement, technical requirements and how to deal with storage of fuels. The stakeholder or operator knows in advance the requirements to comply with. The operation can be started after 90 days of leaving the notification.

The authority checks the conditions of registration when the notification has been submitted and that information included is sufficient. It registers the activity in the database and informs the operator. If

the operator is not complying with the requirements, the authority shall by supervision demand the compliance.

There is no public hearing in the registration process and it is not possible to give opinions in advance which might be considered as a negative impact. Starting point for the registration is that the environmental impacts of the sector are concerned as minor and that the level of environmental protection is not reduced. However a party concerned may afterwards complain to the municipal authority on the nuisance of the operation.

There are certain situations when the activity cannot be registered. An environmental permit is required if the operation is to be situated in a groundwater area that is important or otherwise suitable for water supply use or if the operation may place an unreasonable burden e.g. in the form of noise or dust, in the surroundings.

References/Further information:

The sector specific Government Decrees for fuel distribution stations (444/2010), small combustion plants (445/2010, replaced by 750/2013), asphalt mixing stations (448/2010, replaced by 846/2012) and on the limitation of emissions into the air from certain activities and installations that use organic solvents (64/2015) are available in Finnish and in Swedish: <http://www.finlex.fi/fi/>

The information for registration is available in Finnish and Swedish on the following address:

http://www.ymparisto.fi/fi-FI/Asiointi_luvat_ja_ymparistovaikutusten_arviointi/Luvat_ilmoitukset_ja_rekisterointi/Ymparistonsuojelulain_mukainen_rekisterointi

It includes notification form and guidance how to fill in the form for fuel distribution stations, small combustion plants, asphalt mixing stations and certain activities using organic solvents.

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Additional comments: *Please include any additional information you may wish to provide here.*