

EXPERIENCE FROM IMPLEMENTING BAT IN BULGARIA

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- ▣ BAT implementation. Prerequisites for application:
- ▣ - Bulgaria has closed in 2003 Chapter 22 Environment from its accession negotiations to the European Union;
- ▣ - Bulgaria ratified the Gothenburg Protocol in 2005, which in many cases foresees the application of BAT.

- ▣ Implementation of the Best Available Technics in Bulgaria is done through the system of Integrated Pollution Prevention and Control (IPPC) permits, as in the other Member States (MS);
- ▣ This system, which is only one of the instruments used to protect environment, applies an integrated approach to control and minimize the environmental impacts of the main industrial activities;

- ▣ The IPPC is in force for the EU member-states since 1999 and initially has been applied to new activities. Existing facilities were covered by 2007;
- ▣ EU legislation establishes the requirements regarding the IPPC permits, but each MS implements them according to its legislative system. Bulgaria started to develop its own IPPC legislation well before becoming an EU member;
- ▣ It should be noted that the implementation of the IPPC system has changed the way in which the process of permitting the operation of large industrial installations is organized and the way their activities is controlled.

- ▣ Bulgarian legislation:
- ▣ 1. Environment Protection Act:
- ▣ - Provides a legal basis for implementation of the IPPC system; defines the scope of the IPPC - industrial activities covered by IPPC; capacity of installations; competent body for issuing the IPPC permits; competent control bodies; IPPC content; requirements for emission limitations (**BAT Conclusions**), operators' obligations under the IPPC issuing procedure, conditions for IPPC permits changes etc.

- ▣ 2. Ordinance for Issuing IPPC Permits:
- ▣ The ordinance specifies:
 - ▣ - the content and format of the applications for complex permits;
 - ▣ - the order and the way to define BAT;
 - ▣ - the order and the way to revise, amend, update, and revoke issued IPPC permits;
 - ▣ - the order of reporting the emissions of harmful substances;
 - ▣ - the conditions for monitoring and the obligation to provide the relevant information for the control bodies.

- ▣ The process of issuance and application of IPPC permits is a sufficiently complicated process and apart from the mentioned normative acts, a number of methodologies have been developed and applied which facilitate the work of the IPPC system:
- ▣ - Methodology for application for an IPPC permit (information which has to be submitted by an installation operator in order an IPPC permit to be issued);
- ▣ - Methodology for control of IPPC permits (obligations of the control bodies and operators, way of control, way of imposing sanctions etc.);
- ▣ - Methodology for the minimum requirements for an IPPC permit (specifies the type, the location and the content of the individual conditions that must be included in the permit).

- ▣ - Methodology for BAT determination:
- ▣ Describes the information which has to be submitted by the operator to demonstrate the application of BAT in the following cases
 - ▣ ➤ when a new installation will start operation, or
 - ▣ ➤ changes of an existing installation is to be undertaken.
- ▣ Cases of application of the newest technique, of a technique described in the BAT conclusions, of a technique not described in the conclusions, in cases of lack of applicable conclusions etc. are included.
- ▣ The methodology also describes the procedure for demonstrating BAT in cases of an initial issuing of the IPPC permit for existing installations (this is an element that must be mandatory in the regulatory framework of countries that are beginning to apply the BAT system).

▣ **Thank you for your attention!**