

T F T E I



Under the Convention on Long Range Transboundary Air Pollution

Results from the questionnaires

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Workshop to Promote the Ratification of Technical Protocols of the UNECE Air
Convention with Focus on Countries in the EECCA Region
14 to 16 May 2019, Berlin, Germany

Questionnaires

- Do you expect to ratify the three latest protocols? When? if not, could you provide details on difficulties encountered?
 - Since April 2016, date of our first Berlin Workshop on BAT, have you made progress in the implementation of the BAT concept and integrated permit? Please provide details
 - What are the obstacles to the implementation process (legislative, economic, structural, data availability, etc)? Do you think that the BAT concept can be implemented in your country sooner or later under the present conditions or would your legal framework of permitting for industrial installations need further implementation/adaptation/change?
 - Which is the expected schedule and the time span for an envisaged complete implementation of the BAT concept?
 - Does your country use BAT for permission of single installations already?
 - Is it for new installations only or for existing installations also? If yes, please provide some details (date of compliance, basis for the definition of BAT, etc.
 - Do you prioritize some sectors? Please, specify which sectors.
 - Do you have proposals on how to improve the cooperation with other Bodies and Parties of the Convention?
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Do you expect to ratify the three latest protocols? When? if not, could you provide details on difficulties encountered?

On eight replies:

- One country should ratify the 3 protocols in 2019, another one in 2021 (a national plan for ratification updated),
- For the six other countries, measures are taken and progress towards new legislative measures is observed. The situation is as follows:
 - Most countries are taking appropriate measures to progress (draft Law on air protection; Code of environment, engagement in EU association agreement...) but there is no indication on the timeframe
 - One country is less advanced and is exploring the possibility of joining the different protocols. Amendments on a Law on air protection have been adopted very recently
 - One country explains its difficulties on VOCs. There is no modern measuring equipment in use for control of compliance with the Protocol obligations. The country is however working on technical annexes and country capacity to reach the ELVs

Since April 2016, date of our first Berlin Workshop on BAT, have you made progress in the implementation of the BAT concept and integrated permit?

In most of the cases, important steps have been made to progress towards better air management :

- Work engaged with the support of the Convention on analysis of the national legislation for implementation of BAT and improvement of national emission inventories
- Set up of an EU technical assistance for “effective monitoring of air emissions improvement of environmental management”. In this scope, development of guidelines for integration of air emissions in the existing environmental integrated permits for selected industrial sites. Pilot studies for air emission permits
- Active work in an EU association agreement. An integrated permit system will be implemented in 2020 and BAT in 2026. A twinning has been launched for strengthening the administrative capacities of the Ministry in the field of industrial emissions and hazard
- Within an EU association agreement, development of a state policy in the field of industrial emissions. The concept has to be approved and, as soon as approved, a draft law on integrated prevention and control of industrial pollution is planned by the end 2019. Draft Laws developed to set up ELVs for LCP, Waste incineration, VOCs activities

What are the obstacles to the implementation process (legislative, economic, structural, data availability, etc)?

Do you think that the BAT concept can be implemented in your country sooner or later under the present conditions or would your legal framework of permitting for industrial installations need further implementation/adaptation/change?

Obstacles cited :

- **Economic:** enforcement of BAT difficult for economic reasons for most countries. Enterprises are outdated and large energy consumers: time required and high costs
- **Legislative:** modification and improvement of existing laws required; Law and by-laws have to be developed
- **Technical:** absence of BAT documents in the country language, lack of exchange platform or data base for BAT adapted to the country
- **Administrative organisation:** lack of institution for expert assessment of the compliance with the criteria of BAT

Which is the expected schedule and the time span for an envisaged complete implementation of the BAT concept?

Programmes defined in some cases but dates not defined for the other ones

- Permit system implemented in 2020 and BAT in 2026
- Implementation of the state policy on BAT until 2028
- Implementation of BAT could be achieved in 2035
- Will be defined after creation of the appropriate legislative framework
- Timeline and framework not yet defined
- Indefinite term

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- Do you prioritize some sectors? Please, specify which sectors.

Different levels of implementation

- BAT are used in the cases of complex environmental permits : activities are as example
 - Facilities for livestock breeding and fattening with the capacity of 5 thousand animals and more;
 - Facilities for breeding and fattening pigs with a capacity of 12 thousand and more pigs;
 - Facilities for poultry breeding with a capacity of 500 thousand and more;
 - Food production facilities (except for facilities that divert industrial wastewater to the centralized water disposal (sewerage) system);
 - Textile and light industry facilities where washing, bleaching, mercerizing or dyeing of fibres or textiles is carried out with a capacity of 10 tons per day or more;
 - Facilities for the production of pulp and (or) pulp and (or) wood pulp with a capacity of 100 thousand tons per year and more, paper and (or) cardboard with a capacity of 20 tons per day and more;
 - Facilities for the production of petroleum products and coke;

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Different levels of implementation

- BAT are used in the cases of complex permits : activities are as example
 - Facilities for the production of non-metallic mineral products;
 - Metallurgical production facilities;
 - Thermal power plants and other installations for the production of electricity, steam and hot water of the total design capacity (heat and electricity) of 100 megawatts and more;
 - Production wastewater treatment facilities with a capacity of 5 thousand cubic meters per day and more and (or) municipal wastewater treatment facilities with a capacity of 50 thousand cubic meters per day and more;
 - Facilities for decontamination and use of industrial waste of the first and third hazard classes with a capacity of over 1,000 tonnes per year

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Application of BAT is existing on case by case. Different levels of implementation

- Best technologies are required to be used by new facilities,
- Transitional period requiring BAT implementation with in a relevant timescale (from 2019 to 2026)
- Industries of the first group (the largest polluters) should implement BAT to comply with maximum permissible emission standards (but there is no expert assessment of the technology),

Priority in BAT:

- For one country BAT priority is: oil and gas sector, cement, waste management and waster water treatment
- For another one, BAT priority is: energy, mining, metallurgical, glass, cement

Do you have proposals on how to improve the cooperation with other Bodies and Parties of the Convention?

Exchange of information is highlighted in various domains and different ways:

- Assistance needed in organising information exchange activities on best available practices on the use of BAT in various sectors, with participation of other countries and all interested professionals
- Joint seminars
- Exchange of information on air quality improvement
- Exchange of information, consultations, results of scientific research : monitoring of air pollution, national reporting of emissions, examples of good practice related to the reduction of emissions of pollutants into the atmosphere

Thank you very much
for your attention!
Questions?

Технический секретариат TFTEI

