IMPLEMENTATION OF BEST AVAILABLE TECHNIQUES
IN THE RUSSIAN FEDERATION: OVERVIEW

Alexander Romanov
Russian Federation
National Environmental norms and standards are generally strict

Pollution limits establishment system at the enterprise level is “flexible” and allows to set “relaxed” not-limiting values

Environment pollution fees are low and thus do not stimulate entities to introduce “greener” technologies

No economic incentives for turning “green”

State Environment Control authorities do not have objective information on pollution scales (no continuous monitoring)

Results and considerations of the State environmental expertise used as non-binding recommendations, not directly preventing potentially environmentally damaging activities

Administrative barriers adversely affect the investment climate
Federal law no.219-FZ “On amendments to the Federal law “On environmental protection” and other legal acts of the Russian Federation” aimed at enhanced environmental protection regulation and introducing incentives for economic entities to apply best available techniques

Entry into force – 1 January 2015

- Group economic entities by their environmental impact and apply different regulation approaches – 4 categories
- Introduce an electronic register of all economic entities (enterprises)
- Re-launch of the State Environmental Expertise and Environment Impact Assessment
- Introduce BAT-based environment regulations for major enterprises
- Introduction of Integrated Environmental Permits (instead of 3 separate release permits)
- Reduced number of controlled pollutants
- Modernization of the environmental payment system and introduction of economic incentives to reduce pollution
- Improvement of industrial environmental monitoring, including application of CEMs
DIFFERENTIATION OF POLLUTERS

MAJOR POLLUTERS
≈ 12-15000 UNITS
90% OF POLLUTION GENERATED

MIDDLE LEVEL POLLUTERS
≈ 70000 UNITS

MARGINAL POLLUTERS
≈ 220-270000 UNITS
10% POLLUTION GENERATED

INSIGNIFICANT POLLUTERS
(minimal level of impact)

DIFFERENTIATED MEASURES
INTEGRATED ENVIRONMENTAL PERMIT
DECLARATION
REPORTING

SECTORS WITH THE LARGEST ENVIRONMENTAL IMPACT
ENERGY (ТЭК)
CHEMICAL
PETROCHEMICAL
METALLURGY
UTILITIES (ЖКХ)
CEMENT
FOOD PRODUCTION AND AGRICULTURE
PULP AND PAPER

BAT-BASED REGULATION
TRANSITION TOWARDS BAT: STEPS

CATEGORIZATION OF ENTERPRISES – 4 CATEGORIES

CATEGORY I ENTERPRISE LISTING

ADOPTION OF THE LIST OF POLLUTANTS FOR REGULATION AND CONTROL

DEVELOPMENT AND PUBLICATION OF NATIONAL BAT REFERENCE DOCUMENTS

SETTING OF TECHNOLOGY-BASED BAT EMISSION AND RELEASE LEVELS FOR INDICATOR POLLUTANTS

SHIFT FROM SEPARATE PERMITS FOR EMISSIONS, RELEASES, WASTE DEPOSITION TOWARDS THE INTEGRATED ENVIRONMENTAL PERMIT BASED ON BAT

DEVELOPMENT OF THE ENVIRONMENTAL EFFICIENCY PROGRAMMES BY ENTERPRISES

RELEASE OF THE INTEGRATED ENVIRONMENTAL PERMIT (IEP)

ADOPTION OF THE PROGRAMMES BY THE GOVERNMENTAL INTERAGENCY COMMISSION/ POSITIVE DECISION OF THE STAGE ENV.EXPERTISE

REQUEST FOR IEP BY THE ENTERPRISE

PROGRAMME TIMEFRAME

14 YEARS – FOR BACKBONE AND STRATEGIC ENTERPRISES

7 YEARS – FOR OTHER ENTERPRISES
Transitions towards BAT: timeline

- Newly-constructed industrial enterprises comply with BAT requirements
  - 2015-2021

- Implementation of BAT at 100 existing “pilot” industrial facilities
  - 2021-2026

- Levels of emissions and releases of 300 major “pilot” industrial facilities are in compliance with BAT standards
  - 2026-2033

- All major industrial facilities (ca. 15 000) compliant with BAT
  - 2033-2040

The law #219-FZ
ECONOMIC INSTRUMENTS

**INCENTIVES**

**BAT IMPLEMENTATION PERIOD**
- Costs for pollution abatement and BAT application to be deducted from environmental fees (up to 100%)

**POST-BAT IMPLEMENTATION**
- Pollution abatement and BAT application investments to be deducted from environmental fees (up to 100%)
- "Zero" environmental fees for entities fully shifted to BAT
- Environmental fees to be accounted for and subject to tax deduction (profit tax)

**PENALTIES**

**VIOLATIONS OF IMPLEMENTATION TIMETABLE**
- Pollution fees to be increased by factor up to 100

**BAT IMPLEMENTATION REJECTED**
- Pollution fees to be increased up to levels comparable with costs for pollution control
DEVELOPMENT OF BAT REFERENCE DOCUMENTS

TECH. WG → Data collection → Draft Reference document development → Public and technical expertise → Finalization → Adoption

REQUEST → QUESTIONNAIRE → INPUT DATA → TECHNICAL WORKING GROUP

DRAFT REF. DOCUMENT → FEEDBACK → BAT REFERENCE DOCUMENT

(информационно-Технический Справочник НДТ)
## DEVELOPMENT OF BAT REFERENCE DOCUMENTS

### 51 BAT REFERENCE DOCUMENTS (ИТС НДТ) TO BE DEVELOPED

### 10 REFERENCE DOCUMENTS ADOPTED IN 2015; 12 TO BE ADOPTED IN 2016, E.G.

<table>
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<tr>
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<tbody>
<tr>
<td>«Производство целлюлозы, древесной массы, бумаги, картона» / Production of cellulose, pulp, paper and board</td>
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<tr>
<td>«Производство аммиака, минеральных удобрений и неорганических кислот» / Production of ammonia, mineral fertilizers and inorganic acids</td>
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<td>«Производство меди» / Copper production</td>
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<td>«Производство керамических изделий» / Production of ceramics</td>
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<td>«Производство стекла» / Production of glass</td>
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<td>«Производство цемента» / Production of cement</td>
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<tr>
<td>«Производство извести» / Production of lime</td>
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<td>«Очистка сточных вод при производстве продукции (товаров), выполнении работ и оказании услуг на крупных предприятиях» / Waste water treatment related to production, works or services at large enterprises</td>
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<tr>
<td>«Обезвреживание отходов термическим способом (сжигание отходов)» Waste incineration</td>
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SIMULATION EXERCISE

**BASELINE**

UNDER THE GOVERNMENT PLAN FOR THE YEAR OF THE ENVIRONMENT OF THE RUSSIAN FEDERATION

**AIM**

TESTING PROCEDURES FOR APPLICATION, REVIEW AND RELEASE OF THE INTEGRATED ENVIRONMENTAL PERMIT

**OPPORTUNITIES**

- FINDING AGREEMENT BETWEEN THE INDUSTRY, GOVERNMENTAL BODIES AND CIVIL SOCIETY
- ADDRESSING INTERESTS OF THE INDUSTRY;
- TRAINING OF REGIONAL ENVIRONMENTAL SUPERVISION REPRESENTATIVES
THANK YOU FOR YOUR ATTENTION!

СПАСИБО ЗА ВНИМАНИЕ!