Registration replaces environmental permitting for certain activities in Finland

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Background for the registration in Finland

- Before 2010 around 21,000 activities or installations were subject to environmental permits according to the Environmental Protection Act (86/2000)
  - The same integrated permitting process is applied from small to large installations
  - 7,000 installations are permitted by the state permit authority
  - 14,000 installations are permitted by the municipal permit authority
  - Only less than 10% on the installations need permits on the basis of EU legislation

- Development projects were started in 2005
  - Objective was to lighten and simplify permitting process
  - Reduce the administrative burden
  - Harmonize the environmental requirements if possible
Background for the registration in Finland

• The development project concluded in 2007 that a “lighter” registration process could be introduced for certain activities by issuing them harmonized environmental protection requirements as general binding rules.

• The registration could be applied to sector if:
  • There is a large volume of plants (in number):
    • 2,000 fuel distribution stations, 900 small combustion plants
  • Environmental impacts are minor
  • The permit requirements are similar within the sector
  • Standardised techniques are used or implemented

• It was estimated that the registration with general binding rules would not weaken the level of environmental protection.
Implementation of the registration

• Registration was adopted as part of Environmental Protection Act in 2010
  • First it was a derogation from a permit but since 2014 it has been independent process for certain named activities

• These activities are
  • Combustion plants with rated thermal input of at least 5 but less than 50 megawatts
  • Fuel distribution stations with total fuel tank volume of at least 10 m³
  • Asphalt mixing plants
  • Solvent using activities where the solvent consumption is at most 10 tonnes per year
• These all fall under the permitting competence of municipal authorities
Implementation of the registration

• Registration is a pure notification
  • The operator submits notification to the municipal environmental protection authority for registration into the environmental protection database
  • It shall be submitted no later than 90 days before the operation begins
  • The starting point is that the activity complies with the general binding rules of that sector

• The municipal authority
  • checks the conditions for registration,
  • registers the activity in the database and informs the operator
  • A registration fee is charged

• No decision is made and no additional provisions can be given

• No public participation in registration process
Implementation of the registration

• Applied for new activities since June 2010

• A transition period has been adopted for existing activities to comply with requirements of general binding rules and make the notification

• Combustion plants until 1 January 2018
• Fuel distribution stations until 1 January 2020

• Solvent using activities
  • Registration has been applied since 2001
Implementation of the registration

• 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

• The number of permits will be reduced by around 3 000 due to registration of
  • fuel distribution stations
  • combustion plants (5-50 MW)
  • asphalt mixing plants
  • solvent using activities
Implementation of the registration

- The environmental requirements are issued in the general binding rules
  - Depending on the sector they cover
- Measures
  - To reduce emissions to air,
  - To protect soil,
  - To abate noise,
  - Implement technical requirements and
  - To deal with fuel storages, waste and waste waters
- Requirements
  - To monitor emissions and operation
  - To report annually on operation and emissions
  - To take action when closing down
Impacts of the registration

- The total emissions of the activities covered by the registration are small compared to total annual emissions in Finland and the impacts are often local.
- Positive environmental impacts can be seen:
  - In combustion plants:
    - Reduction of SO2, NOx ja PM emissions, improved local air quality.
  - In fuel distribution stations:
    - Reduction of VOC emissions, risks to water and soil pollution minimized.
  - In solvent using activities:
    - Reduction of VOC emissions, improved air quality.
  - In asphalt mixing stations:
    - Reduction of PM emissions, improved air quality and reduced noise nuisance.
Some concluding remarks of the registration

- Administrative burden has been reduced
  - Less time needed for registration than for permit
  - Operator submits the notification 90 days before starting
  - No decision is made by the authority
    - No additional requirements possible
    - The work of supervisory authority might be increasing
- Harmonized environmental requirements as general binding rules for 4 sectors
  - The operator knows in advance what requirements it has comply with
  - Equal treatment of operators
  - Operation can be started after this 90 days period of notification
- A pure notification
  - No public participation in registration process
  - But participation included when the general binding rules prepared
Thank you for your attention!

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