



Lessons Learned

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Observations



- Normally an IPPC permit replaces some previous permitting for emissions e.g. permits for;
 - Water
 - Air
 - Waste management
- Legislation does not revoke existing permits in Serbia leading to confusion



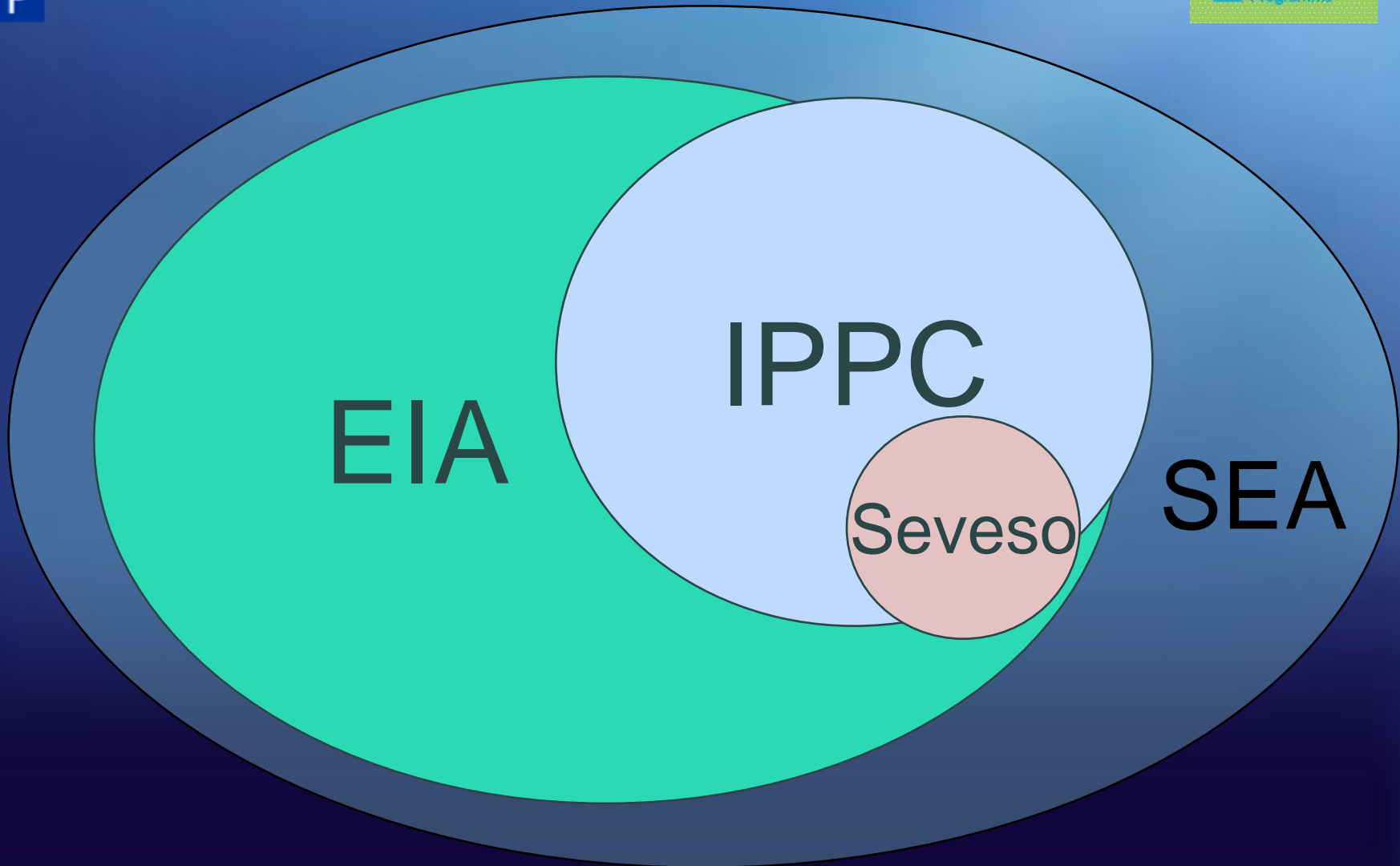
Observations



- The IPPC process must be complimentary with other processes, e.g.;
 - Environmental Impact Assessment
 - Seveso (Major Accident & Hazards)
- But their administration must be harmonises



EIA, IPPC, Seveso



IPPC

EIA

Building

Required or Not

Required or Not

Pre Feasibility Study

EIA Required

Public Consultation

Public Consultation

Consultation with Authorities

Scoping

Public Consultation

Submit Application

Submit EIA

EIA Process

Public Consultation

What about BAT?

Draft Permit

Main Project Design

Public Consultation

Civil Works

Technical Commission

Technical Commission

Technical Inspection

Final Decision

Final Decision

Operation Permit

Enforcement of Permit

Enforcement of Conditions ?

Enforcement of Permit ?

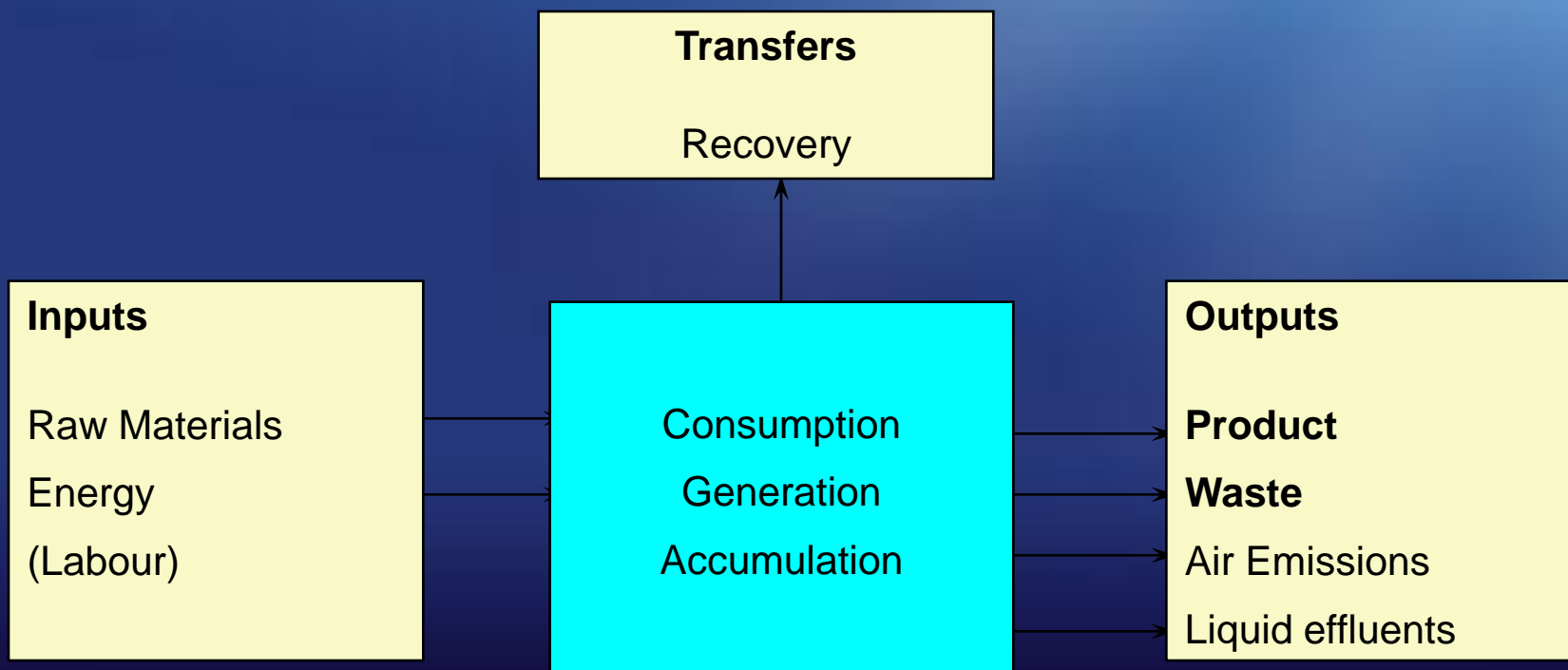


The Application of BAT

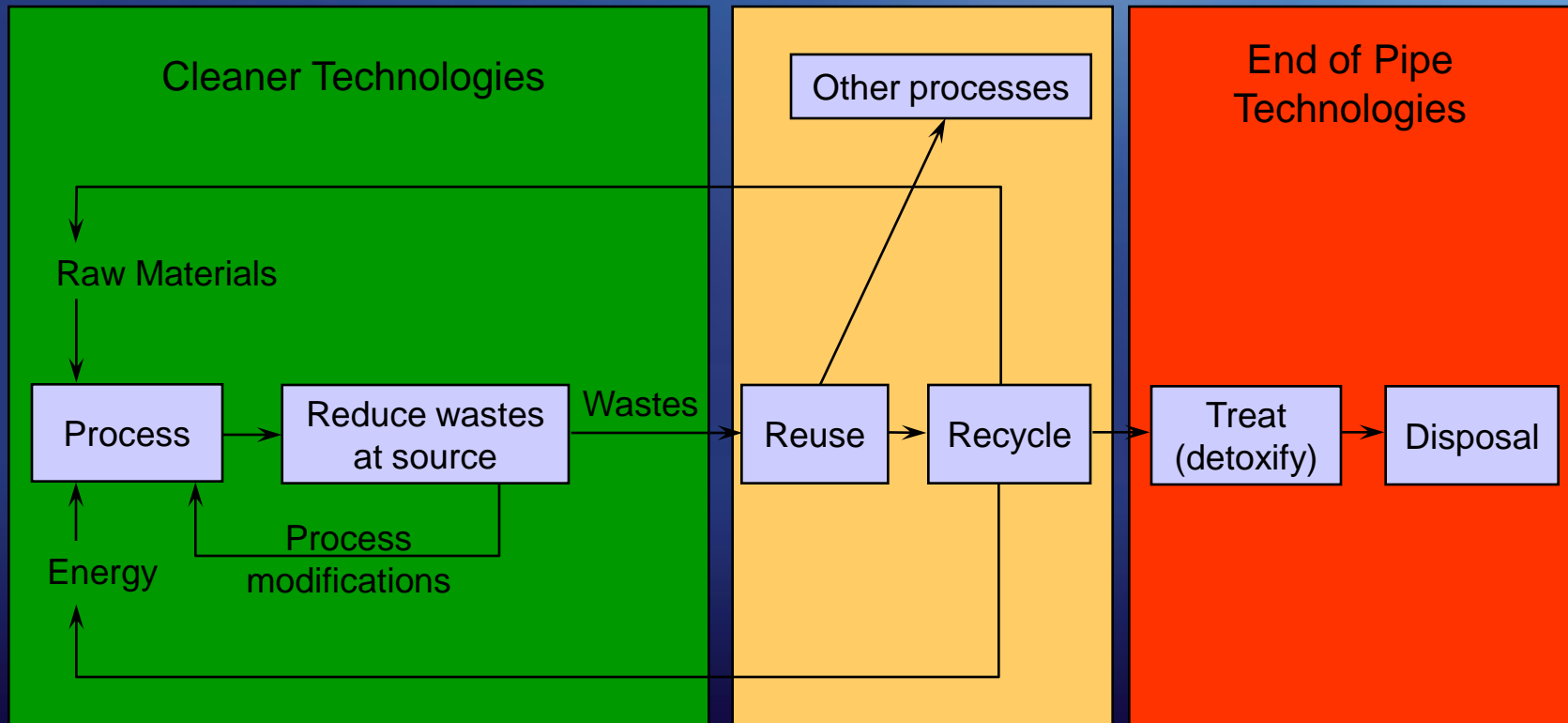


- This is the Key aspect of Integrated Pollution and Prevention Control Permitting.
- For a new activity BAT covers all aspects, it can not be retrofitted.

Total System Basics



Hierarchy of Pollution Control





Observations



- Complex licence addressing many areas
- The licence requires a lot of self monitoring which is reported to the CA
- It also requires the keeping of a lot of environmental records which must be checked by or reported to CA
- There are many plans and programmes which must be agreed by the CA as part of the licence
- Licensee must seek approval from CA before any change to process etc.



Observations



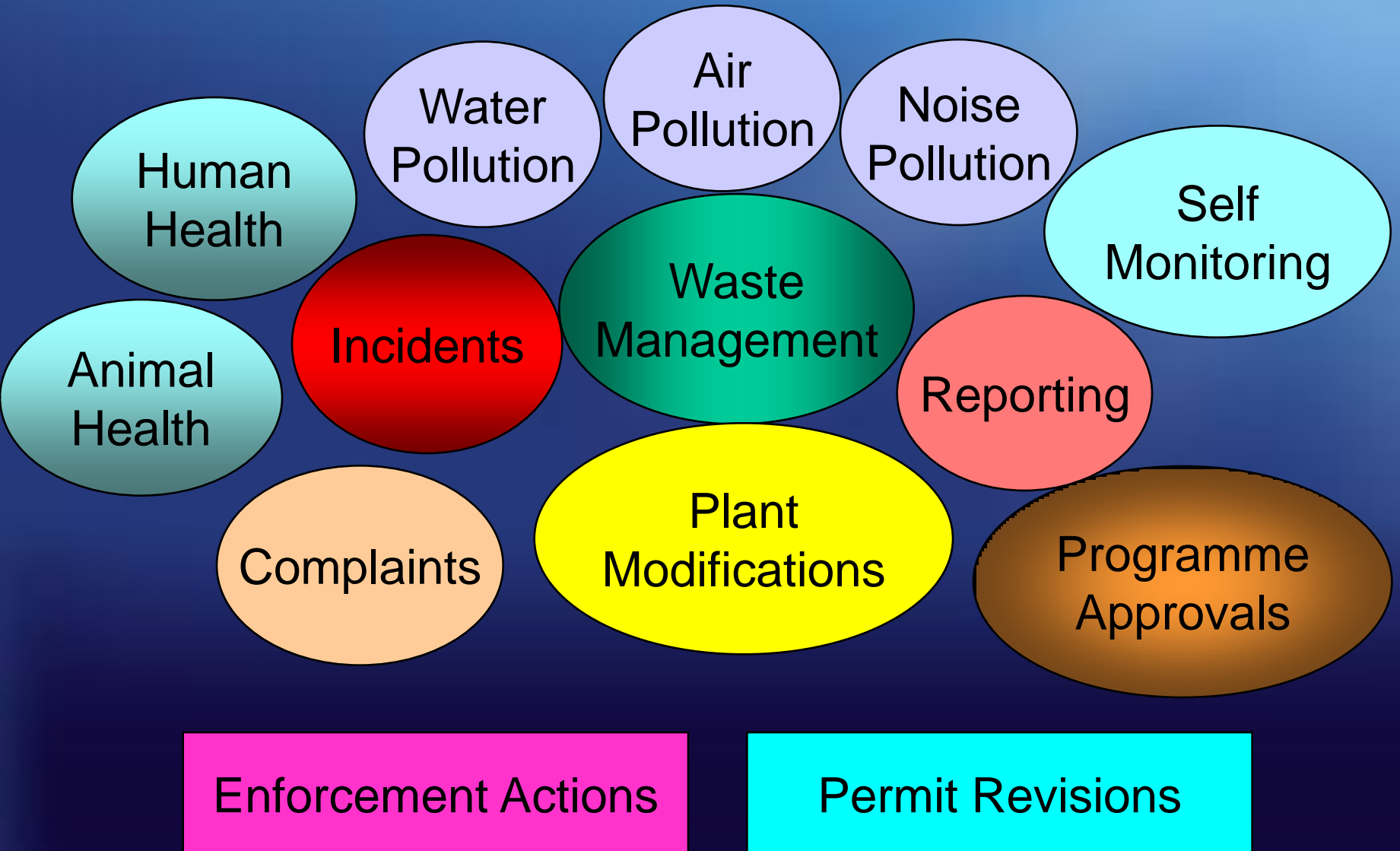
- In general the more information obtained during the permitting process the less downstream work.
- However in practice few industries are in a position to provide all information in application and will be a particular problem in Serbia given short time frame.
- So many programmes to be agreed post licensing.



**Issuing the Permit is just part of
the job**

What happens after that?

Post Permit Issues





Questions



- Who will check what
- Who will approve plans and programmes
- What about Water – reporting, enforcement
- What about Waste – reporting, approvals



The Big Issues



- Harmonisation of Laws
 - EIA, Waste, Water, Building Permit
 - Introduction of BAT at the beginning
- Harmonisation of Organisations
 - Working together, minimising work on the industry, eliminating duplication etc. clear reporting lines and authority.



The Big Issues



- Resource Availability
 - Are there enough staff to do the job properly
 - In particular what about the Regions and Municipalities
- Capacity Building
 - What approach will be used to ensure all of the expertise required is available to the Competent Authorities?



IPPC

Obligation or Opportunity



- IPPC great opportunity
- As much economics as environment
- Investment 200-500 million euro
- How this is used is in your hands
- Always prioritise process improvement over abatement
- Opportunity to make more efficient industry able to compete on world market
- On other hand, what value has life?



Thank you

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