



INZRAK

Enhanced environmental protection inspection for efficient control of air quality monitoring and of all entities under obligation within system of greenhouse gas emission allowance trading, in order to achieve better quality of air in Republic of Croatia



REPUBLIKA HRVATSKA

MINISTARSTVO ZAŠTITE  
OKOLIŠA I ENERGETIKE



 **safu** | SREDIŠNJA AGENCIJA ZA  
FINANCIARANJE I UGOVARANJE



This project is funded by the European Union



**EKONERG**

Energy research and Environmental Protection Institute



# 11: INSPECTION MONITORING

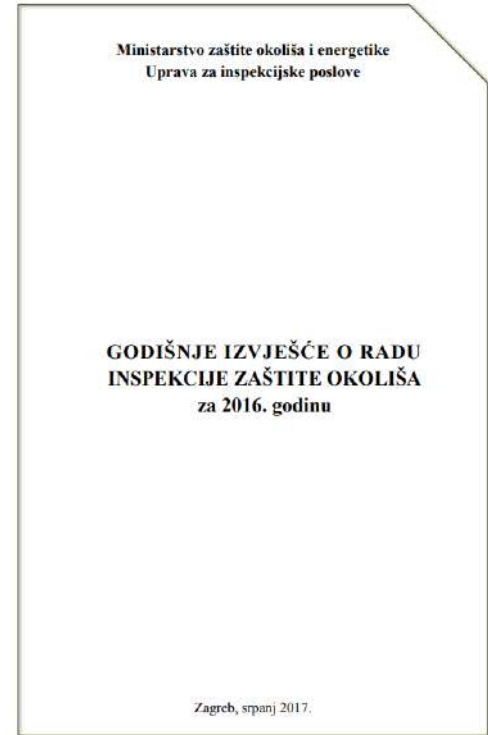
# 11.6 RMCEI – EXAMPLES FROM PRACTICE

PLAN RADA INSPEKCIJE ZAŠTITE OKOLIŠA ZA 2017. GODINU

I kvartal	II kvartal	III kvartal	IV kvartal
Koodinirani inspeksijski nadzori temeljem Sporazuma o suradnji inspeksijskih službi u području okoliša			
Nadzor provedbe mjera zaštite okoliša u djelanjima o procjeni utjecaja na okoliš			
Nadzor prekograničnog prometa otpadom (luka, cestovni pravci, granizni prijelazi...)			
Nadzor turističko - ugostiteljskih objekata (hotela)			
Nadzor proizvođača građevinskih proizvoda			
Nadzor ovlaštenika za gospodarenje otpadom			
	Nadzor odlagališta otpada		
	Nadzor reciklažnih dvorišta		
	Nadzor velikih izvora medicinskog otpada		
	Nadzor tiskara		
	Nadzor trgovačkih centara		
	Nadzor bioplinih postrojenja		
	Nadzor obveznika dozvole za ispuštanje stacionarnih plinova		
	Nadzor velikih građevinskih tvrtki		
	Nadzor luka		

Suradnja u međunarodnim mrežama i njihovim projektima, te drugim aktivnostima u okviru međunarodnih institucija u svrhu razmjene iskustava o provedbi inspekcija u području zaštite okoliša, sudjelovanje u aktivnostima tehničkih radnih skupina, provedba projekata koji se provode u MZDE i drugim državnim tijelima u RH, stručno osposobljavanje.

Priprema i izrada godišnjeg izvješća o radu, nadzori po prijavama; kontrolni nadzori i ostalo iz nadležnosti inspekcije zaštite okoliša.



## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **What is „RECOMMENDATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 April 2001 providing for minimum criteria for environmental inspections in the Member States”**

These are recommendations that prescribe the harmonization of environmental inspections (ENVIRONMENTAL INSPECTION) in the EU Member States based on experience and knowledge of the European Union network for the implementation and enforcement of environmental law (IMPEL).

These recommendations are also incorporated into the Environmental Protection Act.

## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **Why were they adopted?**

To ensure the best implementation of environmental regulations and to achieve minimum criteria for inspection in the EU.

## 11.6 RMCEI EXAMPLES FROM PRACTICE

- **What is „ENVIRONMENTAL INSPECTION” - inspection in environmental protection?**
  - These are all activities that involve compliance verification of EU regulations and / or regulations of the member states that was transposed from EU legal requirements in the field of environmental protection
  - Monitoring the impact of controlled installations on the environment to determine whether further action is required
  - Monitoring EU standards, checking documentation, and site space

## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **What is „ENVIRONMENTAL INSPECTION” - inspection in environmental protection?**

### Application in Croatia

*Inspection of environmental protection within its competencies carries out inspection of legal and natural persons over the **application** of the Environmental Protection Act, the Law on Air Protection, the Law on Sustainable Waste Management and the Act on the Protection of Light Pollution, and regulations passed under these laws regulating general environmental issues, air protection, waste and hazardous waste management, and light pollution protection. (ANNUAL REPORT ON THE WORK OF THE ENVIRONMENTAL INSPECTION FOR 2016)*

## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **Inspection of whom?**

All those who have emissions into the environment (water, air, soil) and who need to be licensed under EU regulations for their work - we call them "CONTROLLED INSTALLATIONS"

Application in the Republic of Croatia

*IZO (Inspection in environmental protection), within its scope of competence, monitors the obligation of legal and natural persons in carrying out environmental permit measures, solutions to integrated environmental conditions and environmental impact assessment, monitors emission sources of air pollutants, air quality and waste management, takes measures to remove adverse effects on the environment due to extraordinary events, monitors the quality of bathing water on the beaches, cross-border waste transport, treatment of substances that damage the ozone layer, the implementation of ratified international agreements and other matters within the scope of competence.*

*(ANNUAL REPORT ON THE WORK OF THE ENVIRONMENTAL INSPECTION IN 2016)*



## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **Who can conduct an environmental inspection?**

Each competent authority appointed by the EU Member State and assigned to this area

Application in the Republic of Croatia

Article 224. of Environmental Protection Act

Inspection supervision of the application of this Act and regulations passed on the basis of this Act shall be carried out by civil servants in the Ministry assigned to workplaces with the authority to carry out inspections of environmental protection, unless provided otherwise by this Act.

## 11.6 RMCEI - EXAMPLES FROM PRACTICE

- **Organizing Environmental Inspection**

Each Member State shall ensure that an environmental inspection provides a high level of environmental protection and that monitoring of controlled facilities is organized and conducted in accordance with the same criteria and that the monitoring reports contain relevant information in accordance with the recommendations.

### **ANNUAL REPORT ON THE WORK OF ENVIRONMENTAL PROTECTION INSPECTION for 2016**

#### *2. GENERAL DATA ON INSPECTION OF ENVIRONMENTAL PROTECTION 4*

##### *2.1. Competence*

##### *2.2. Goals and priorities*

##### *2.3. Structure*

##### *2.4. Administrative capacities*

## 10.5 RMCEI - planning - EXAMPLES FROM PRACTICE

- **Plans for inspection in environmental protection**

Each Member State shall ensure that the environmental inspection is planned in advance and that such plans cover monitoring of controlled installations throughout the territory of the Member State and that all inspection bodies carry out monitoring in the same way.

*Inspections in the area of the environment are carried out in accordance with the annual plan and work program of the Environment Protection Inspection prepared pursuant to Article 227 of the Environmental Protection Act.*

*In order to perform coordinated monitoring, the annual plan and program is aligned with the annual plans and programs of other inspections.*

## 10.5 RMCEI - planning - EXAMPLES FROM PRACTICE

- **What should plans be based on?**
  - EU regulations to be applied
  - the register of controlled installations and their compliance with EU environmental standards
  - assessment of major environmental threats
  - data on previous monitoring

## 10.5 RMCEI - planning - EXAMPLES FROM PRACTICE

- **Plan for environmental protection inspection should contain at least following**
  - geographic area it covers
  - the time it covers
  - include special audit requirements
  - identification of location or types of controlled installations, including the frequency of monitoring by type or location
  - routine monitoring programs with regard to the form of environmental threat
  - to provide framework procedures for non-planned controls in the case of complaints of citizens, accidents, cases of non-compliance or issuance of permits
  - to ensure coordination between the various inspection bodies if they exist

## 10.5 RMCEI - planning - EXAMPLES FROM PRACTICE

*The plan is based on **strategic environmental protection documents**, the **problems identified** in the previous **annual reports** on the work of the environmental protection inspection, the data from the Environmental Pollution Register and the UIP databases and other sources (Croatian Chamber of Commerce, Croatian Crafts Chamber, the Central Bureau of Statistics) at the national level. In determining priorities for the planning of inspection, **the risk and the environmental impact** of the operator's **activities** are first considered in relation to air pollution and waste production, production capacity, complexity of the technological process, **possible risk of using or storing hazardous substances**, **prior compliance of the operator with the provisions of regulations**, and the need to implement new regulations*

# 10.5 RMCEI - planning

PLAN RADA INSPEKCIJE ZAŠTITE OKOLIŠA ZA 2017. GODINU

I kvartal	II kvartal	III kvartal	IV kvartal
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Nadzor tiskara			
Nadzor trgovačkih centara			
Nadzor bioplinskih postrojenja			
Nadzor obveznika dozvole za ispuštanje stakleničkih plinova			
Nadzor velikih građevinskih tertki			
Nadzor luka			
Suradnja u međunarodnim mrežama i njihovim projektima, te drugim aktivnostima u okviru međunarodnih institucija u svrhu razmjene iskustava o provedbi inspekcije u području zaštite okoliša, sudjelovanje u aktivnostima tehničkih radnih skupina, provedba projekata koji se provode u MZOE i drugim državnim tijelima u RH, stručno osposobljavanje.			
Priprema i izrada godišnjeg izvješća o radu, nadzori po prijavama; kontrolni nadzori i ostalo iz nadležnosti inspekcije zaštite okoliša.			

PLAN RADA INSPEKCIJE ZAŠTITE OKOLIŠA ZA 2015. GODINU

I kvartal	II kvartal	III kvartal	IV kvartal
Koodinirani inspekcijski nadzori temeljem Sporazuma o suradnji inspekcijskih službi u zaštiti okoliša			
Nadzor ovlaštenika opasnog otpada			
Nadzor Županija i gradova vezano za izradu i provođenje plana gospodarenja otpadom te izvršenje obveze iz članka 35. Zakona o otpadu			
Nadzor prekograničnog prometa otpadom (luke, cestovni pravci, prijelazi...)			
Nadzor odlagališta otpada u smislu kontrole sanacije i izvršenja zadaća propisanih programom aktivnosti u provedbi posebnih mjera zaštite od požara			
Nadzor postupanja s TOOS (obveza isključivanja halona)			
Nadzor osoba ovlaštenih za gospodarenje posebnim kategorijama otpada koje se bave oporabom i/ili recikliranjem otpada			
Nadzor gradova, općina i komunalnih poduzeća vezano za primjenu Uredbe o komunalnom otpadu			
Nadzor objekata MORH-a (vojna vježbališta)			
Nadzor prodavatelja EE opreme			
Provedba twinning light projekta iz IPA i Komponenta 2011 FFRAC programa „Jačanje kapaciteta inspekcije zaštite okoliša i predstavnika nadležnih državnih tijela i drugih institucija za sprečavanje, prepoznavanje, istrage i procesuiranja u slučajevima dijela protiv okoliša“			
Suradnja Uprave za inspekcijske poslove u međunarodnim mrežama (IMPEL, RENA, THEMIS, INECE i dr.) i njihovim projektima, te drugim aktivnostima u okviru međunarodnih institucija (INTERPOL i dr.) u svrhu razmjene iskustava o provedbi inspekcija u području zaštite okoliša, sudjelovanje u aktivnostima Tehničke radne grupe (TWG 2) za primjenu SEVESO II direktive, sudjelovanje u radnim grupama projekata koji se provode u MZOIP i drugim državnim tijelima u RH, stručno osposobljavanje.			
Priprema i izrada Godišnjeg izvješća o radu, nadzori po prijavama; kontrolni nadzori i ostalo iz nadležnosti inspekcije zaštite okoliša			

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **On-site monitoring**

Each Member State should ensure that the following criteria are always applied in all inspections

- to always check the EU regulations relevant to the given monitoring
- If more inspectors conduct monitoring, they share all relevant information both from the field and other information
- that reports are made about the findings of inspection on the basis of the criteria described in the RMCEI and that they are available to all competent authorities in the territory of the Member State
- that inspectors have the legal basis to be provided with access to the monitored operator and to all relevant information
- due to non-compliance/ irregularity



## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **What are the types of inspection?**

Routine - planned

Unplanned

- due to complaints
- due to accidents
- Due to non-compliance/ irregularity

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Planned – routine on-site monitoring**

Each Member State should ensure that inspections of controlled plants are regularly carried out as part of routine environmental monitoring and that the following criteria are always applied

- during routine monitoring, to re-examine the entire impact of the monitored facility on the environment in the context of the relevant regulation, monitoring programs and in accordance with the organizational aspects of the inspection body
- that such monitoring promotes and enhances the knowledge of operators in this area
- to assess the effectiveness of the existing permit of the monitored facility in view of its environmental impact and to consider the need to change the permit in the sense of its improvement

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Planned - routine on-site monitoring**

### *4.1.6. Supervision of counties and major cities related to air quality monitoring*

*The purpose of the monitoring was to determine the fulfillment of obligations related to air quality monitoring prescribed by the Air Protection Act.*

*The work plan envisages monitoring of all counties, the City of Zagreb, 16 major cities and the city of Kutina, and a total of 38 inspections were carried out, i.e. all planned inspections.*

*In order to overcome the identified irregularities, a total of 25 measures have been given to the record for the elimination of non-compliances related to the development of program for air and ozone layer protection, climate change mitigation and adaptation to climate change, which is an integral part of the environmental protection program. A total of 8 measures were executed, while others did not expire in terms of their deadline for execution.*

*expiration date expired.*

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Unplanned on-site monitoring**

Each Member State should ensure that unplanned inspections are carried out in the following cases

- in serious environmental complaints and as soon as possible after receiving such complaints
- in the case of serious accidents and incidents as well as serious inconsistencies with EU regulations, and as soon as possible after such information reaches the inspection body
- prior to the commencement of the work of the monitored facility and after issuing a permit therefor to determine whether the operations of the operator comply with the measures and requirements of the permit
- for the same reasons when changing the license to a monitored facility

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Unplanned on-site monitoring**

Citizens' complaints

*During the year 2016, the Environmental Inspection received 1067 complaints, of which, according to the sender's structure, the largest number were those coming from citizens and anonymous claimants.*

*Also received were applications from various state bodies, institutions and associations: the Ministry of the Interior, local authority units, other inspections, non-governmental organizations, People's Ombudsman, the State Attorney's Office, the Office of the President of the Republic of Croatia, the Government of the Republic of Croatia and the Croatian Parliament.*

*Environmental inspection has acted and implemented the appropriate procedures according to the 911 complaints received, of which 200 were forwarded to other inspection bodies. There were 18 anonymous incomprehensible and unclear complaints that could not be further processed.*

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Unplanned on-site monitoring**

### Exceptional circumstances

A special group of unplanned monitoring of environmental inspection consists of extraordinary events. Reports on emergency incidents are received through the State Office for Protection and Rescue - Center 112, information from other competent authorities such as the Ministry of the Interior or the Customs Administration of the Ministry of Finance and by the direct notification of the operator who, under the provisions of the Environmental Protection Act, has a duty to notify the competent authorities without delay on all relevant aspects and measures taken to prevent damage to the environment caused by the performance of their activities or their reduction to the least extent possible.

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- **Unplanned on-site monitoring**

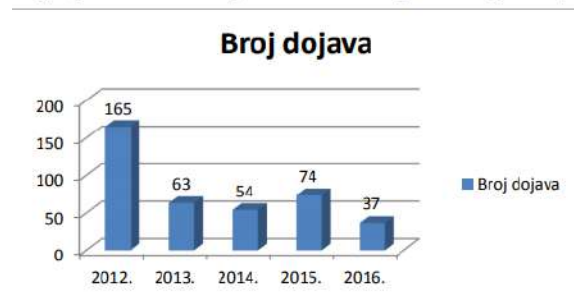
### Exceptional circumstances

*During the year 2016, 37 reports of exceptional circumstances events were received on the basis of which 44 inspections were carried out by environmental inspectors. Of the total of 37 alarms, two alarms had no environmental pollution detected. There was only one unjustified alarm. Of the remaining 34 warnings, 30 cases have an unknown pollutant.*

## 10.5 RMCEI - monitoring - EXAMPLES FROM PRACTICE

- Unplanned on-site monitoring

Broj dojava IZO u 2016. godini u odnosu na prethodne godine prikazan je na grafu 1.



Graf 1: Prikaz broja zaprimljenih dojava o izvanrednim događajima

Broj onečišćenja po sastavnicama okoliša 2016. prikazan je na grafu 2.



Graf 2: Prikaz onečišćenja po sastavnicama okoliša



## 10.5 RMCEI – reporting on monitoring- EXAMPLES

### FROM PRACTICE

- **Reports and conclusions after on-site monitoring**

Each Member State should ensure that, after each inspection on monitoring and the conclusions adopted subsequently, a report is compiled that will be uniquely labeled and recognizable.

The report should contain findings on compliance with the EU regulations for a monitored facility, assessment and conclusions on the need to undertake further procedures (measures to address deficiencies, initiate misdemeanor or criminal proceedings, modify the permit).

It should also contain information on whether there is a need for subsequent inspection.

The report shall be made as soon as possible after monitoring is completed.

## 10.5 RMCEI - reporting on monitoring- EXAMPLES

### FROM PRACTICE

- **Reports and conclusions after on-site monitoring**

Once written, each report should be kept in the available database.

The full report or, if it is not practical, its conclusions, should be delivered to the operator of the supervised plant in accordance with Directive 90/313 / EEC. The report should be available to the public for up to two months after inspection.

## 10.5 RMCEI - EXAMPLES FROM PRACTICE

- **Investigation (inspection) in cases of serious accidents, incidents and non-compliances**

Each Member State should ensure that investigation (monitoring) is carried out by the competent authority in the event of serious accidents, incidents and non-compliances with EU regulations for the purpose

- to determine the cause of the event and, if possible, responsibility for the event and to report to the competent authorities (the State Attorney's Office) if necessary
- reduce or if possible mitigate the impact of an event on the environment through the determination of measures to be taken by operators or competent bodies
- to establish measures to prevent the event from developing further in the negative direction
- to initiate a misdemeanor or criminal procedure if necessary as well as to ensure that the operator takes appropriate action

# 10.5 RMCEI - reporting on monitoring- EXAMPLES

## FROM PRACTICE



**REPUBLIKA HRVATSKA**  
 MINISTARSTVO ZAŠTITE OKOLIŠA,  
 PROSTORNOG UREĐENJA I GRADITELJSTVA  
 Uprava za inspeksijske poslove  
 Odjel inspeksijskog nadzora  
 Područna jedinica u Sisku  
 Tel/fax: 044/524-392, 524-397, 0912877240

KLASA: 351-02/10-18/9  
 URBROJ: 531-07-1-5-2-LT-10-2  
 U Sisku 10. veljače 2010.

### ZAPISNIK

o obavljenom inspeksijskom nadzoru

u INA Industrija nafte d.d., SD Rafinerije i marketing, Sektor Rafinerija nafte Sisak, Sisak, A, Kovačića 1.

Nadzor je obavljen po službenoj dužnosti sukladno članku 182. Zakona o zaštiti okoliša (NN 110/07) te članku 64. Zakona o zaštiti zraka (NN 178/04 i 60/08) s početkom 12 sati.

Predmet nadzora: kakvoća zraka u vrijeme akcidenta.

Inspeksijski nadzor je obavila mr.sc. Lidija Tadić, dipl.ing.kem., viša inspektorica zaštite okoliša Područne jedinice u Sisku.

Kao stranka nadzoru je nazočni:

- Darko Galić, dipl.ing.kem. - rukovoditelj OJ Održivi razvoj, zaštita zdravlja, sigurnosti i okoliša
- Đorđe Reljić, dipl.ing.kem. – Glavni inženjer proizvodnje.

Odgovorna osoba u pravnoj osobi je direktor INA RNS-a Damir Butković (rođen: 29. 5. 1966. godine u Sisku), Trg Franje Tuđmana 12, Petrinja.

ŽIRO RAČUN POSLOVNE BANKE: PBZ 2340009-11000220902.

Nazočni su na osnovi članaka 143. i 182. Zakona o općem upravnom postupku (NN 53/91 i

**EKONERG** Energy Research and Environmental Protection Institute

### TIJEK IZVANREDNOG DOGAĐAJA I POSTUPANJA:

9. veljače 2010.

Rukovoditelj OJ Održivi razvoj, zaštita zdravlja, sigurnosti i okoliša u INA RNS obavijestio je ovu inspekciju telefonom u 9 sati da je došlo do gašenja baklje na KP-4, najvjerojatnije uslijed zamrzavanja cjevovoda plina. INA RNS je odmah plinove preusmjerila na peći i pristupila otklanjanju kvara te o događaju obavijestila javnost odnosno Županiju sisačko-moslavačku, Grad Sisak, ŽC 112, te SEA-u.

S obzirom na poteškoće u radu Državne postaje Sisak-1 od 6. veljače 2010. godine Rukovoditelj zaštitnih poslova je odmah po gašenju baklje obišao postrojenja te naselje Caprag u kojem se organoleptički nisu osjetili neugodni mirisi.

Županijski centar 112 je obavijestio inspekciju u 9 sati i 13 minuta kako su zaprimili jednu dojavu iz centra grada Siska o neugodnim mirisima. Organoleptičkom provjerom mirisa u centru grada Siska ova je inspekcija utvrdila neugodne mirise u ulici Stjepana i Antuna Radić te Rimskoj ulici.

Pregledom podataka o kakvoći zraka ustanovljeno je da je na mjernoj postaji Sisak-3 u 10 sati izmjereno 33,33  $\mu\text{g}/\text{m}^3$  sumporovodika, a na mjernoj postaji Galdovo 1  $\mu\text{g}/\text{m}^3$  sumporovodika. U okviru inspeksijske provjere kakvoće zraka na postaji Sisak-3 također su uočene nelogičnosti u radu senzora za benzen te je o tome obaviješten EKONERG. Iz EKONERGA je potvrđeno da su uočili navedene nelogičnosti te da će provjeru rada mjernih postaja Sisak-1 i Sisak-3 obaviti tijekom dana.

S obzirom na akcident te moguća onečišćenja zraka, inspeksijski nadzor kakvoće zraka obavljat će se stalno na svim imisijskim postajama sve do otklanjanja kvara odnosno otklanjanja uzroka mogućeg onečišćenja.

Istoga dana u 13 sati i 10 minuta INA RNS (Darko Galić) je obavijestila ovu inspekciju kako je baklja na KP-4 upaljena te kako se vrlo brzo očekuje stabilizacija njezinog rada te izostanak neugodnih mirisa.

Inspeksijskim pregledom podataka o kakvoći zraka u vrijeme trajanja akcidenta, utvrđeno je slijedeće:

POSTAJA SISAK – 3

5 prekoračenja satnih graničnih vrijednosti sumporovodika, ostala onečišćenja ispod GV;

10 sati – 33,3  $\mu\text{g}/\text{m}^3$ ,

11 sati – 13,4  $\mu\text{g}/\text{m}^3$ ,

12 sati – 24,1  $\mu\text{g}/\text{m}^3$ ,

13 sati – 36,5  $\mu\text{g}/\text{m}^3$ ,

14 sati – 15,9  $\mu\text{g}/\text{m}^3$ .

POSTAJA GALDOVO

Nije izmjereno niti jedno prekoračenje satne GV sumporovodika niti ostalih onečišćenja.

POSTAJA SISAK – 1

U vrijeme akcidenta u naselju Caprag se organoleptički nisu osjetili neugodni mirisi a nije bilo niti dojava građana iz toga dijela grada.



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**THANK YOU FOR YOUR ATTENTION**

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