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**Ministry of Environment, Czech Republic
Federal Ministry for the Environment, Nature Conservation, and Nuclear
Safety, Federal Republic of Germany**

FINAL REPORT

**European Union Twinning Light Project CZ01/IB/EN1-TL
“Strengthening of the Application of the Directive 96/61/EC on IPPC”**

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18/7/03

I. Report by the Member State Partner

1. Identification

- Twinning light Project No.: CZ01/IB/EN1-TL
- Final Report
- Submitted by: Martina Karbowski

2. Executive Summary

The objective of the project was to contribute to the implementation of Directive 96/61/EC on Integrated Pollution Prevention and Control (IPPC). In particular, this twinning light project was to support the implementation of articles 9, 10, and 11 (application of Best Available Techniques (BAT)) and 17 (transboundary effects) through the application of three selected Best Available Techniques Reference Documents (BREF) in the Czech Republic on slaughterhouses and animal by-products, food and milk processes, and textile processing.

The project was divided in the 3 subprojects: Implementation of article 17 of the Directive, Textile Processing, and Slaughterhouses/Animal By-Products/Food/Milk. The project started with the Kick-off Meeting in Prague on 5-6 December 2002 and ended on 4 June 2003.

The project has been carried out as planned and the expected results of the project have generally been achieved. This is not at least attributed to the excellent co-operation with the Czech partners. The work on the project and discussions proceeded in a very friendly and constructive atmosphere being profitable for both partners.

2.1 Implementation of article 17 of the Directive: In the course of the project, an assessment of article 17 of the IPPC-Directive has been made together with the Czech partner. The activities were focused on the transboundary information exchange on the transboundary effects of environmentally relevant projects and plans. In a workshop with about 40 participants, the German experts presented the procedures in a Member State for the implementation of article 17 of the Directive and provided advice on options for the Czech Republic for transboundary co-operation with its neighbouring countries in this area. During a study visit to Germany, the German expert presented the transboundary effects of plants, the licensing procedures, and the procedures related to environmentally relevant incidents in Germany.

2.2 Textile Processing: In the course of the project, a workshop, a seminar, a pilot permitting procedure, and study visit to textile plants were arranged in close cooperation of experts from Czech authorities and short-term experts (STEs) from a Member State (Germany). These activities, in particular the seminar, served as an information exchange forum to inform operators of the textile industry as well as the staff of the regional permitting authorities about the entire field of the IPPC-Directive, the Czech IPPC-Act and how to implement the BATs in the IPPC permitting procedure. Based on experiences of the STEs, detailed questions of the permit procedure as well as of the assessment of permit applications were discussed.

Additionally, a guideline including model-permitting conditions was developed in order to provide all Czech authorities concerned with a harmonised catalogue of issues, which have to be considered within the licensing procedure. The items listed therein reflect the requirement of using BATs regarding the environmental impact of textile production and represent a

schedule of the main items of an assessment of applications for a permit. The guideline allows for a consistent mode of assessment of applications for a permit, although a slight adaptation ("fine tuning") to formal aspects of the Czech legislation might be necessary. In order to demonstrate how BATs can be integrated in textile installations, a study visit to two installations in Germany has been performed and upcoming questions have been discussed with the operators.

The guideline as well as the lively and open discussions on the meetings will enable the Czech authorities to proceed in accordance with the IPPC-Directive of the EC when permitting textile installations.

2.3 Slaughterhouses and Animal By-Products/Food and Milk: In the course of the project, a workshop, two seminars, two pilot permitting procedures, and a study visit to slaughterhouses and milk plants were arranged in close cooperation of experts from Czech authorities and STEs from a Member State (Germany). These activities, in particular the seminars, served as an information exchange forum to inform operators of the slaughterhouses and animal by-products, food and milk industries as well as the staff of the regional permitting authorities about the entire field of the IPPC-Directive, the Czech IPPC-Act and how to implement the BATs in the IPPC permitting procedure. Based on experiences of the STEs, detailed questions of the permit procedure as well as of the assessment of permit applications were discussed.

Additionally, guideline materials were developed in order to provide all Czech authorities concerned with information, which has to be considered within the licensing procedure. The guideline materials reflect the requirement of using BATs regarding the environmental impact of slaughterhouses, animal by-products, food and milk processes and contain the main items of an assessment of applications for a permit. In order to demonstrate how BATs can be integrated in slaughterhouses/animal by-products/food/milk installations, a study visit to installations in Germany has been performed and upcoming questions have been discussed with the operators.

3. Background

The overall objective of the project was to enable the Czech Republic to take on the obligations of EU membership ensuring from the Copenhagen criteria, in particular adherence to the aims of the political, economy and monetary union, and the *acquis communautaire*.

The specific purpose of the project was to facilitate the adoption and enforcement of the *acquis* by providing twinning light assistance. The project was to contribute to the overall aim of the full implementation of Directive 96/61/EC on IPPC. In particular, this twinning light project was to support the implementation of articles 9, 10, and 11 (application of BAT - Best Available Techniques) and 17 (transboundary effects) through the preparation of the application of three selected BREFs (Best Available Techniques Reference Documents) in the Czech Republic:

1. Slaughterhouses and Animal By-products,
2. Food and Milk Processes,
3. Textile Processing.

The Czech Draft Act on Integrated Pollution Prevention Control, on Integrated Pollution Register and amendments of some laws (hereinafter 'Act on IPPC') was finalised in spring 2001. This draft was approved by the Czech Government in June 2001 and then submitted to the Parliament. The Czech Parliament passed the Act on IPPC on 5th February 2002 and the Czech president signed it few days after the approval. The Act on IPPC was published in the Czech Collection of Law on 1st March 2002 under number 76/2002. By this date, the paragraphs concerning the agency/expert support (§ 5 and § 6) came into effect. The Act designs the regulation procedures based on the Directive 96/61/EC and the institutional framework for the IPPC procedures. The whole Act came into effect on 1st of January 2003.

The implementation plan on IPPC, which comprises the overall strategy on implementation of IPPC, was approved by the Czech Government in July 2000 and was up-dated in July 2001. The Czech Government on 14th November 2001 took the up-dated version of the implementation plan on IPPC into account. Its detailed version was prepared within the framework of the Twinning project Phare 2000 on Implementation Structures for IPPC and Register IRZ (Integrated Pollution Register).

The twinning light project was a tool for assisting the Czech Ministry of the Environment (MoE) in understanding the process of integrated permitting in the areas of slaughterhouses and animal by-products, food and milk processes, and textile processing with the assistance of experts from an EU Member State.

The general environment for the implementation of the twinning light project was very favourable. The twinning light project was based on the ongoing twinning project CZ2000/IB/EN-01 on Implementation Structures for IPPC and

Register IRZ. The twinning light project was implemented in a very constructive and open atmosphere between both partners.

However, there were some problematic features. During the drafting of the project proposal and the contract, it became obvious that the requirements of the project fiche relating to the working days of the experts of the Member State were no longer adequate. Moreover, the per diem for the Member State experts was raised from 193€ to 274€ by the Commission in the time between the preparation of the project proposal and the contract. Therefore, the Member State proposed some changes to the work schedule for the experts. This led to a lengthy discussion with the Commission and a considerable delay in the start of the project.

Unlike twinning projects, there is no full time project assistant (CC national) for twinning light projects, which can deal with local project management, translation, and interpretation. Project management, therefore, had to be done by the administrations of the Member State and the Final Beneficiary. This created an additional burden for both administrations and made procedures for e.g. translations and interpretation rather cumbersome.

The twinning light project had a budget of 150,000 €. It turned out during the drafting of the contract and the implementation of the project that this sum was too limited to cover all necessary activities. Additional funds would have been necessary for a technical assistant/interpreter, for interpretation, for translations, for refreshments/meals during workshops/seminar/simulation exercises, for the rent of meeting rooms, and for a final meeting of the participants of the project.

According to the twinning regulations, budget reallocations between budget sections for a cumulated amount of up to 10% of the total budget of the twinning light project can be made without prior approval by the Commission and the CFCU. Budget reallocations between budget sections for a cumulated amount beyond 10% of the total budget of the twinning light project require prior approval by the Commission and the CFCU. For the twinning light project, with a rather small budget of 150,000 € this limit was quickly reached. Budget reallocations, therefore, needed the prior approval of the Commission and the CFCU. This procedure turned out to be very time-consuming and led to delays in the implementation of the necessary changes. In one case, the whole process from the consultation with the final beneficiary until the approval by the Commission and the CFCU took 7 weeks, which means almost a third of the time for the implementation of the project.

4. Summary of the Twinning Light Activities during the Reporting Period

The project was divided in 3 subprojects:

- Implementation of article 17 of the Directive
- Textile Processing
- Slaughterhouses/Animal By-Products/Food/Milk

The project started with the Kick-off Meeting in Prague on 5-6 December 2002 and ended on 4 June 2003.

4.1 Implementation of Article 17 of the Directive

4.1.1 Inception phase: Kick-off Meeting

Aim of the meeting:

- Information of all partners and stakeholders on the project goals and structure
- Preparation of project facilities and staff

Date: 5-6 December 2002

Place: Prague, Ministry of Environment

Participants:

Mrs. Rudlova, Ministry of the Environment

Mr. Umhey, Government Presidency Freiburg, German expert

Results:

The Kick-off Meeting on 5-6 December was used by the actors to get to know each other and to explain their positions in their administrations. After this personal introduction, the German expert made a lecture with transparencies to explain the historical development and present relevance of transboundary co-operation in the *Land* (federal state) Baden-Württemberg. More detailed administrative regulations in any form are very appropriate after the implementation of the IPPC-Directive in national law because neither the directive nor the Czech act, which will enter into force on 1 January 2003, contain any specific information on this issue.

The experts prepared the planned workshop on transboundary effects and clarified the questions related to the place and date of the workshop, the participants, the organization, the programme, and the procedure.

4.1.2 Workshop on the Application of Article 17 of the IPPC-Directive on Transboundary Effects

Aim of the meeting: analysis of the application of Article 17 of the IPPC-Directive and its transposition into national law in the Czech Republic and the Federal Republic of Germany

Date: 30 January 2003

Place: Prague, Ministry of Environment

Participants:

Some 40 representatives from Ministry for Environment; Ministry for Agriculture; regional authorities;
Mr. Umhey, Government Presidency Freiburg, German expert; Dr. Reichmann, Ministry of Environment Saxony; Dr. Baumann, District Government of Upper Palatinate, Bavaria

Results:

As an introduction to the subject, the German expert gave a short report on the development and current practice of the transboundary cooperation between Germany, France and Switzerland on the Upper Rhine. In the course of the workshop, a number of questions e.g. on the content of transboundary information were addressed. As a background to the issue, excerpts of the relevant legal texts like Article 17 of the IPPC Directive were compared. The expert gave a number of examples of actual cases of information between Germany and France and between Germany and Switzerland in order to demonstrate day-to-day practice in transboundary participation on the Upper Rhine. The workshop participants agreed that further details for the implementation of article 17 would have to be worked out for the co-operation between the Czech Republic and the Federal Republic of Germany, respectively the German border states Bavaria and Saxony, in the form of implementation rules under the Czech-German Environment Agreement of 1996. It would consequently be desirable for the Czech-German Environment Commission to discuss this subject at its next meeting and commission a working group to take on this task. The trilateral agreement from the Upper Rhine could well be used as an example in this work.

The Czech-German Environment Commission has met on 5-6 March 2003 in Prague. The Commission has decided that both sides should start to co-operate for the implementation of the IPPC-Directive in a transboundary context.

4.1.3 Study Visit to Member State (Focused on Textile Industry Environmental Aspects and Transboundary Effects)

Aim of the meeting:

- Visits of appropriate IPPC installations regarding to no. 6.2 of the annex I of the Directive
- Visits of Member State (MS) permitting authority
- Meeting with the experts from MS Technical Working Group (TWG) on Textile Processing
- To support understanding of the approach to the issue of “transboundary effects”

Date: 20 March 2003

Places: Augsburg

Participants:

Mrs. Simona Rudlova, Ministry of Environment (MoE); Mrs. Eva Bauerova, MoE; Mrs. Tereza Ticha, MoE; Mr. David Hrdousek, MoE; Mr. Petr Rosinec, Regional Authority; Dr. Richard Vesely, Regional Authority
Mr. Umhey, German expert

Results:

After the welcome by Dr. Wunderlich, Vice-President of the Bavarian Environmental Protection Agency, STE Mr. Umhey gave a lecture on transboundary effects of plants and the official proceeding in Germany with licensing procedures and incidents.

Benchmarks:

The foreseen benchmarks have fully been reached.

- Participation of 6 Czech experts (2 from Regional Authorities, 4 from MoE)
- Background materials
- Mission report

4.2 Textile Processing

The textile finishing industry can be characterized by extremely high fresh water and chemical consumption, thus accounting for corresponding high waste water and exhaust air emissions. The high environmental impact of textile production installations gave reason for including this industrial branch into Annex I of the Directive 96/61/EC on IPPC. According to the Directive, the operating of such an installation has to meet particular requirements, i. e. the use of best available techniques in order to prevent environmental pollution. When granting a permit for operating, the competent authorities have to check whether the installation works in compliance with BATs documented in the BREF for the textile industry, which will be published shortly. The aim of the current project was the implementation of the Directive 96/61/EC on IPPC for

textile installations of category 6.2 of the Appendix of the Directive in the Czech Republic.

4.2.1 Inception phase: Kick-off Meeting

Aim of the meeting:

Information of all partners and stakeholders on the project goals and structure, preparation of project facilities and staff

Date: 5-6 December 2002

Place: Prague, Ministry of Environment

Participants:

Mrs. Bauerová, Ministry of the Environment; Dr. Veselý, Regional Authority
Mr. Janák, inoTEX; Mr. Bartušek, inoTEX, Association of Textile Industry (ATI); Mr. Laš, TIBA, representatives of Czech textile companies
Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency, German experts

Results:

The Kick-off Meeting has been used to gather information on the current state of the implementation of the IPPC-Directive in the Czech Republic.

The Czech partners presented an overview on the legislative as well as on the administrative background concerning this matter. There are about 17 Czech textile plants as defined in Annex I, no. 6.2 of Directive 96/61/EC. The TIBA Company, which submitted an application, is one of the largest Czech companies (textile substrates: mainly CO, viscose; production: home textiles; applied processes: pre-treatment (e.g. washing), dyeing, printing, finishing). Based on this information, some gaps, mainly concerning the permitting procedure, have been identified and a need for a guideline or handbook, especially adapted to textile manufacturing, was identified. A proposal for such a guideline has been drafted. A general agreement has been made that the complete BREF for the textiles industry will be the subject of the twinning project. It will not be restricted to the pre-treatment and dyeing processes according to Annex I, no. 6.2. This in mind, a preliminary programme for the further activities has been developed and a time schedule was prepared in co-operation and agreement with the Czech partners.

4.2.2 Preparation of the Workshop and Support Materials on Textile Processing

Aim of the meeting:

Preparation of the workshop and supporting documents for the textile industry

Date: 16-17 January 2003

Place: Prague, Ministry of Environment, No. 124

Participants:

Mr. Feres, Ministry of the Environment; Mrs. Bauerová, Ministry of the Environment; Mrs. Svobodova, Agency for Integrated Permitting (AIP)
Mr. Janák, inoTEX, Association of Textile Industry; Mr. Bartušek, inoTEX; representatives of Czech textile companies
Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency, German experts

Results:

At this meeting, organizational matters for the workshop have been discussed and the parties agreed on the subject matters to be dealt with. Further on, the structure and contents of the guideline on BAT application on textile processing were discussed and worked out in co-operation with the Czech experts.

All parties agreed that it would be helpful to have an interpreter at the workshop, the seminar and the study visit.

Benchmarks:

The foreseen benchmarks have fully been reached:

- Drafted guideline documents on application of BAT/BREFs on textile processing:
 - Constituents for regulations in textile finishing facilities (examples) for the sector air pollution prevention have been prepared
 - Introduction to IPPC-Directive, Seville-process and BREFs
- Plan of workshop preparation (schedule and key organisational points in written form)

4.2.3 Workshop on Application of BAT/BREF on Textile Processing

Aim of the meeting: Consultation of materials for the guideline on application BAT/BREFs on textile processing

Date: 09-11 April 2003

Place: Prague, Ministry of Environment, No. 124

Participants:

Mrs. Rudlova, Ministry of the Environment; Mrs. Bauerová, Ministry of the Environment; Mrs. Svobodova, AIP;
Mr. Janák, inoTEX, Association of Textile Industry; Mr. Bartušek, inoTEX; Representatives of Czech textile companies
Dr. Vesely, Regional Authority Kralovehradecky kraj;

Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency; German experts

Results:

The following topics have been discussed in the meeting:

- Preparation of the seminar:
 - organizational issues (timing, structure, speakers, list of Czech experts who will participate in expert discussion, etc.)
- Preparation of the guidelines:
 - selection and discussion of the contents of the prepared draft materials for the guideline

During this meeting, the drafted documents on textile processing for the guideline were discussed, consulted and finalised. The working group finally agreed on following structure and contents:

No.	Structure	Contents	Author	Status
1	Introduction	<ul style="list-style-type: none"> • EU-Directive • Idea of using BAT/BREF 	MoE	✓
2	BREF	<ul style="list-style-type: none"> • Development • Seville-process • Information exchange • Structure 	ATDK (Mr. Janak)	✓
3	Czech permitting procedure	<ul style="list-style-type: none"> • Description • Use 	MoE	✓
4	Textile industry in Czech	<ul style="list-style-type: none"> • Type, location and number of installations etc. • Main environmental and economic problems of the sector (e.g. water, air pollution) 	ATDK (Mr. Janak)	✓
5	Textile processing and environmental impact: BAT for textile processing	<ul style="list-style-type: none"> • BAT with regard to waste water pollution prevention • BAT with regard to air pollution prevention 	STE (Dr. Fischer) STE (Dr. Schlachta)	✓
6	Appendices	<ul style="list-style-type: none"> • General example for permitting including example permit conditions 	STEs (Dr. Fischer for waste water, Dr. Schlachta for air pollution prevention)	✓

Benchmarks:

No.	Issues	Status
1	Workshop for relevant experts on application of BAT/BREFs on textile processing	✓
2	Guideline materials on application of BAT/BREFs on textile processing developed, consulted and finalised	✓
3	Czech version of background materials on Textile Processing	✓

The benchmark on the guidelines material has been reached. In order to adapt the guideline to Czech legislation, an additional assessment of concerned authorities was recommended by the working group and will be organized by the Ministry of Environment. Statements to be expected from the Czech authorities will be implemented after a critical review.

4.2.4 Seminar on Textile Processing

Aim of the meeting:

Carrying out a seminar on textile processing in a region with a higher number of IPPC-installations from category 6.2 of the Annex I of the Directive 96/61/EC. Contents of the seminar should be:

- General information on IPPC
- Application of BAT/BREF to textile processing
- Expert panel (open discussion) and information on this issue from the Member State

Date: 19-23 May 2003

Places: Regional Authority Kralovehradecky kraj, Hradec Kralove; Company TIBA, Dvur Kralove

Participants:

- Members of working group:
Mrs. Rudlova, Ministry of the Environment; Mrs. Bauerová, Ministry of the Environment; Mrs. Sazamova, AIP
Mr. Janák, inoTEX, Association of Textile Industry; Mr. Bartušek, inoTEX; Mr. Las, TIBA; Mrs. Krausova, TIBA, representatives of Czech textile companies
Dr. Vesely, Regional Authority Kralovehradecky kraj
Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency; German experts
- Representatives of various Czech authorities
- Representatives of Czech textile industry (operators)

Results:

The seminar on Textile Processing was carried out in the Czech region Kralovehradecky.

The seminar was held in compliance with the following agenda:

	Agenda item	Time	CZ	German STEs
Day 1 21/05/03	Introduction <ul style="list-style-type: none"> • Opening of the seminar • Introduction of participants • Short presentation of the seminar 	10:00 – 10:30	MoE	

	programme			
	Introduction to Directive 96/61/EC <ul style="list-style-type: none"> • Background and aim • Important elements • Information exchange 	10:30 – 11:15		Dr. Schlachta
	Information on the “Seville Exchange Process” <ul style="list-style-type: none"> • Role of BREFs in the IPPC Directive (why and how are they written) • Development of BREF • Overview over the kinds of BREF 	11:15 – 12:00	Inotex (Mr. Janak)	
	Textile processing in Czech Republic (CR) <ul style="list-style-type: none"> • Type, location and number of plants • Structure of the branch, main products • Main environmental and economic issues of the sector (e.g. water pollution, air pollution) 	12:00 – 12:45	Inotex (Mr. Janak)	
Lunch		12:45 – 14:00		
	Textile processing and environmental impact: BAT for textile processing: <ul style="list-style-type: none"> • BAT regarding to waste water emission prevention 	14:00 – 15:30		Dr. Fischer
Break		15:30 – 16:00		
	• BAT with regard to air pollution prevention	16:00 – 17:30		Dr. Schlachta
	Conclusions and final discussion 1st day	17:30 – 17:45		
Day 2 22/05/03				
	Czech IPPC-Act: Current status of IPPC implementation	10:00 – 10:20	Regional authority Královeh- radecký	
	Czech IPPC-Act <ul style="list-style-type: none"> • New permit situation in the CR • Czech Permitting procedure • Application form • Steps of procedure 	10:20 – 12:30	MoE (Mrs. Bauerová, Mrs. Tereza Tichá)	
Lunch		12:30 – 14:00		
	German Permitting procedure <ul style="list-style-type: none"> • Overview • Important elements 	14:00 – 14:45		Dr. Schlachta
	Attempt to introduce and apply BREF in the Czech textile industry: Experience with pilot permitting from the view of textile operators	14:45 – 15:45	InoTEX (Mr. Bartusek)	
Coffee/ Tea break		15:15 – 15:45		
	Comments on the pilot permitting from the view of STEs	15:45 – 16:30		Dr. Fischer Dr. Schlachta
	Discussion on permitting procedures	16:30 – 17:00		

Day 3 23/05/03	Operating inspection (study visit) of TIBA for the participants of the seminar	9:00 – 12:00		
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The discussion during the seminar was mainly related to three issues:

- Necessity of BATs according to IPPC in general
- Questions on the Czech permitting procedure for IPPC-plants
- Detailed technical questions.

The representatives of the Czech textile industry raised a question concerning the role of the IPPC-Act including the use of BATs before the background of the Czech environmental legislation. It was quoted that a high standard of environmental protection will already be obtained by the media-related Czech legislation, as there is the Water Act, the Waste Act and the Air Pollution Prevention Act. Additional requirements or emission limits based on the BATs would, therefore, not be necessary in a license. It was argued that the textile industry could not be obliged by the authorities to use the BAT on the basis of existing legislation. Furthermore, there are several data requested in the application form, which seem to be not necessary. As examples, the safety data sheets and data concerning noise emissions were mentioned. Additionally, it was declared that end of pipe technologies would not be covered by the BAT.

In reply to this, the representatives of the Czech authorities as well as the STEs pointed out that in order to decrease the emissions and to raise the level of environmental protection the data asked for were a prerequisite and thereby mandatory. Depending on the different branches, the single aspects of information were, of course, of different importance. But in general, detailed data will be absolutely necessary for an analysis whether or not an installation already corresponds to the high environmental protection level demanded by the IPPC-Directive. Only intimate knowledge of the installation, the technical devices as well as all inputs and outputs allows for an assessment, whether additional measurements based on BAT were required. For the textile branch, information concerning the ecological characteristics of chemicals used and the relevant emissions of harmful substances are of special interest. According to the IPPC-Act, the use of techniques and the setting of limiting conditions in a licence should be based on BAT. The prevention of emissions is the subject of many BATs of the BREF "Textile Industry". In particular, this is true for the selection and usage of low emission auxiliaries concerning preparations, complexing agents, detergents, antifoaming agents, and chemicals containing chlorine or heavy metals. The operators in order to avoid or reduce emissions should primarily apply this kind of BATs. The argument that end of pipe technologies are not an integrated part of BAT was strongly rejected by the STEs. There exists a separate chapter in the BREF concerning wastewater treatment, even if no emission limit values were specified.

Benchmarks:

The seminar on textile processing was successfully carried out as designed at the workshop. The short-term experts gave several lectures on the IPPC-Directive, the German permitting procedure and on BAT/ BREF for textile processing. During the seminar, the lectures were critically discussed in a very constructive atmosphere. A report on the discussion has been prepared. The aim of the activity has completely been reached.

4.2.5 Simulation of Integrated Permitting for an Installation from IPPC Category 6.2

4.2.5.1 First Mission

Aim of the meeting:

Through the simulation of the procedure of pilot permit issuing for individual installation from IPPC category 6.2, the necessary documents for the future IPPC permitting process should be developed. The following issues should be discussed:

- Statements of STEs on pilot application of TIBA (completeness of submitted data)
- Assessments of STEs on pilot application of TIBA (comparison with BAT)

Dates: 07-08 April 2003

Place: Prague, Ministry of Environment, No. 243

Participants:

Mrs. Rudlova, Ministry of the Environment; Mrs. Bauerová, Ministry of the Environment; Mrs. Svobodova, AIP
Mr. Janák, inoTEX, Association of Textile Industry; Mr. Bartušek, inoTEX; Mr. Las, TIBA; Mrs. Krausova, TIBA; Representatives of Czech textile companies
Dr. Vesely, Regional Authority Kralovehradecky kraj
Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency; German experts

Results:

- Statements on the completeness of the pilot application from the German perspective:
 - Clarification of some specific items of the application
 - Identification of gaps of information
- Assessment by the STEs (waste water, air pollution prevention, energy use)
- Presentation of permit conditions (German proposals) concerning
 - chemicals and waste water management (in general)
 - air pollution prevention and energy use specified for TIBA
- Discussion on pilot permit highlighting problems concerning new and existing installations

- Discussion on further steps of the project

In the pilot application of the TIBA Company, necessary information for an assessment was partially missing. The application had to be revised with respect to the requirements of the Guide for Licensing according to the IPPC-Act (prepared in twinning project CZ2000/IB/EN-01, version 4, January 2003). In particular, detailed information is needed concerning input of textile auxiliary chemicals and air and wastewater emissions. For air emission control, the implementation of the emission factor concept was proposed by the STEs. With respect to wastewater emissions, a wastewater register was suggested. If comparing the techniques used with the BAT, several processes are not in accordance with the state of the art (e.g. pigment printing with spirit). However, it should be taken in mind that TIBA Company is an existing plant having time until 2007 to get in compliance with BAT/BREF and the IPPC-Directive.

It will obviously need some additional time to amend the application with the data and information requested according to the Czech Guide as well as the comments of the STEs. Therefore, it was decided that TIBA Company should submit the application to the regional authority, which will amend it with an appropriate memorandum concerning the lack of information and interrupt the permitting procedure as foreseen by the Czech legislation.

Besides that, an example for a permit license should be developed which is based on the standard permitting conditions proposed by STEs. The example conditions should be submitted to the concerned authorities and textile industry association for an assessment, followed by a discussion with the authorities concerned in June (= mentioned as "public hearing" in the work package). Provision is made to publish the discussed and revised example permitting conditions as a recommendation (= mentioned as "pilot permit" in the work package) in the guideline afterwards.

Benchmarks:

No.	Issues	Status
1	Confirmed statements on confidentiality	✓
2	Draft of a pilot application and statements on its completeness from the Ministry and Královéhradecký Region translated into German (German side)	✓
3	Assessment of quality of the application - completeness of submitted data (March/April/German party)	✓
4	Finalising of the pilot application (TIBA+inoTEX)	
5	Pilot statements from concerned authorities (bodies responsible for air protection, water protection, public health etc.) (MoE+Region)	
6	Public hearing (03-06 June 2003/Czech and German parties)	
7	Finalisation of a pilot integrated permit (03-06 June 2003/Czech and German parties)	

8	Guidance materials (in accordance with the German party, German experience will be used for preparation of the guideline on application of BAT/BREF on Textile Processing ¹)	✓
9	Materials for public presentations	

- 1) Guide for Licensing according to the IPPC-Act (prepared in twinning project CZ2000/IB/EN-01, version 4, January 2003; standard permit conditions on waste water management and air pollution prevention)

4.2.5.2 Second Mission

Aim of the meeting: Through the simulation of the procedure of pilot permit issuing for individual installation from IPPC category 6.2, the necessary documents for the future IPPC permitting process will be developed.

Dates: 30 May - 04 June 2003

Participants:

Mrs. Rudlova, Ministry of the Environment; Mrs. Bauerová, Ministry of the Environment; Mrs. Rychlikova, Ministry of the Environment; Mr. Kuklik, Ministry of the Environment; Dr. Rudolf, Ministry of the Environment
Mrs. Svoboda, AIP
Mrs. Kubikova, Regional Authority; Dr. Vesely, Regional Authority
Mr. Moravek, Regional Authority
Dr. Fischer, Federal Environmental Agency; Dr. Schlachta, Bavarian Environmental Protection Agency; German experts

Place: Prague, Ministry of Environment

Results:

Because of the incompleteness of the submitted application form of the TIBA Company, further information was necessary for an assessment and the permitting procedure has been interrupted as foreseen by the Czech legislation.

In agreement with all partners, the work has concentrated on model permitting conditions based on BATs. For this purpose, the STEs presented a proposal. The model conditions have been submitted to the concerned authorities for assessment. The authorities involved in the permitting procedure made statements hereunto, which have been discussed (= mentioned as “public hearing” in the work package) under this work package. It is intended to publish the revised model permitting conditions as a recommendation (= mentioned as “pilot permit” in the work package) in the guideline later on.

The model permitting conditions were developed in order to provide all authorities concerned with a harmonised catalogue of issues, which have to be considered within the licensing procedure. The topics reflect the BATs and represent an essential schedule for an assessment. Even if this model permit covered most of the environmental issues, the regional authorities and IPPC-

Agency may change it or amend it case by case with additional requirements with respect to the specific production and the local conditions of a certain installation.

Because of the very narrow time scale, a final adaptation to the Czech legislative conditions was not possible within this project and has to be carried out by the Czech experts.

Guidance for filling out of an application form has meanwhile been published by the Czech Ministry (Ordinance No. 554 of 16 December 2002).

Benchmarks:

No.	Issues	Status
1	Confirmed statements on confidentiality	✓
2	Draft of a pilot application and statements on its completeness from the Ministry and Královéhradecký region translated into German (German side)	✓
3	Assessment of quality of the application - completeness of submitted data (March/April/German party)	✓
4	Finalising of the pilot application (TIBA+inoTEX)	In preparation
5	Pilot statements from concerned authorities (bodies responsible for air protection, water protection, public health etc.) (MoE+Region)	✓
6	Public hearing (04 June 2003/Czech and German parties)	✓
7	Finalisation of a pilot integrated permit (04 June 2003/Czech and German parties)	✓ ²
8	Guidance materials (in accordance with the German party, German experience will be used for preparation of the guideline on application of BAT/BREF on Textile Processing ¹).	✓ ²
9	Materials for public presentations (see above)	✓ ²

- 1) Guide for Licensing according to the IPPC-Act (prepared in twinning project CZ2000/IB/EN-01, version 4, January 2003; standard permit conditions on waste water management and air pollution prevention)
- 2) The proposal of the STEs for an exemplary pilot integrated permit has to be adjusted according to the specific Czech legal situation; the Czech Ministry with support of the related authorities will do this.

4.2.6 Study Visit to Member State (Focused on Textile Industry Environmental Aspects and Transboundary Effects)

Aim of the meeting:

- Visits of appropriate IPPC installations regarding to no. 6.2 of the annex I of the Directive
- Visits of MS permitting authority

- Meeting with the experts from MS TWG on Textile Processing
- To support understanding of the approach to the issue of “transboundary effects”

Date: 18-19 March 2003

Places: Hof, Selb, Aalen (Unterkochen)

Participants:

Mrs. Simona Rudlova, MoE; Mrs. Eva Bauerova, MoE; Mrs. Tereza Ticha, MoE; Mr. David Hrdousek, MoE; Mr. Petr Rosinec, Regional Authority; Dr. Richard Vesely, Regional Authority
 Dr. Fischer; Dr. Schlachta, German experts; Dr. Sedlak, EnviroTex GmbH; Dr. Müller, Bavarian Water Management Agency; Dr. Drechsel, Textilveredlung Drechsel GmbH; Dr. Eiser, Lindenfarb Textilveredlung; Mr. Denzler, Regional permitting authority Hof; Mr. Brehm, environmental inspector, Regional permitting authority Hof

Results:

18/03/2003

After the welcoming speech by District Council Mr. Hering, Mr. Denzler and Mr. Brehm, representatives of the regional authority District Agency Hof, presented the German permitting system in a lecture. Mr. Sedlak, Director of EnviroTex Research Company, described the requirements for air pollution control with regard to textile factories. Emphasis was placed on the kind and exposure of the emitted substances, the emission factor concept, and the employment of thermal stable preparations as well as the occurrence of odours. A representative of the Bavarian Water Management Agency, Dr. Müller, reported on the requirements for wastewater. Likewise concerning air pollution control, in particular the selection of the chemicals is at the centre of attention as a primary measure.

In the afternoon, a visit of an IPPC installation (Textilveredlung Drechsel GmbH) falling under category 6.2 took place. The company is finishing on commission especially home textiles like net curtain fabrics, upholstery fabrics and technical textiles. The following processes are carried out: washing, bleaching, drying, dyeing, heat setting and finishing. 4 stenters are available (one of them recently installed). The installation represents a modern, state of the art exhaust gas abatement technique consisting of a condensation unit (heat exchangers for energy recovery), electrostatic precipitators and a subsequent wet scrubber.

19/03/2003

Study visit to Company Lindenfarb Textilveredlung, European largest commission finisher of knitted fabrics (detailed information about the company Lindenfarb Textilveredlung is available in English under www.lindenfarb.de). The installation falls under category 6.2 of the annex of the IPPC-Directive.

After a welcome by Mr. Küster, President of the company Lindenfarb Textilveredlung, Dr. Eiser, Head of the Department Environmental Protection, illustrated some general items concerning the environmental prevention and pollution control of the company. Emphasis was placed on the selection of chemicals and the textiles covered with thermostable (low emission) preparations. Thereafter, the installations were visited. In particular the pre-treatment (washing, dying) and finishing machines were of interest. Modern abatement techniques for a clean up of exhaust gases were demonstrated, i. e. electrostatic precipitators with a subsequent wet scrubber. Finally, the wastewater treatment plant, which treats wastewater from the textile production site as well as wastewater from the municipality nearby was visited.

Benchmarks:

The foreseen benchmarks have fully been reached.

- Participation of 6 Czech experts (2 from Regional Authorities, 4 from MoE)
- Background materials (have also been used for the workshop)
- Mission report

4.2.7 Relevant Working Documents Submitted to Project Partners

- Final draft of the BREF Textile Processing (can be downloaded from internet, address: <http://eippcb.jrc.es/pages/FActivities.htm>).
- Guideline on the Determination and Application of BAT in Licensing Procedures (prepared in twinning project CZ2000/IB/EN-01, activity no. 8.2/8.3, Nov. 2002)
- Constituents for regulations in textile finishing facilities (published by the German Länderausschuss für Immissionsschutz)
- Written copies of the lectures, distributed as desk presentations to the participants of the seminar (in Czech).
- Comments of STEs on permit conditions concerning wastewater management, air pollution prevention, waste management and energy usage specified for the TIBA Company.
- Guide for Licensing Procedure according to the IPPC-Act (prepared in twinning project CZ2000/IB/EN-01, version 4, January 2003)
- Statements of the concerned Czech authorities on the proposals of the STEs on model permitting conditions
- "Germany sets the pace on carbon emissions", Textile Technology International, 69 (2001)
- Lecture of Dr. Müller, Bavarian Water Management Agency, held during the study visit

- Lecture of Dr. Sedlak, EnviroTex GmbH, held during the study visit
- Contribution of Dr. Fischer, STE, on the textile guideline:
 - BAT with regard to waste water pollution prevention
 - Appendices:
 - 1) German wastewater regulation: Appendix 38 Textile manufacturing and finishing, 2) proposal for a wastewater register, 3) model permit conditions
- Contribution of Dr. Schlachta, STE, on the textile guideline:
 - BAT with regard to air pollution prevention, waste management and energy usage
 - Appendices:
 - 1) Overview of the BATs in the textile industry, 2) Overview of the emission relevant exhaust gases of textile finishing plants, 3) Typical emissions data of textile finishing plants, 4) Emission potential of textiles coloured with the usage of carriers, 5) Emissions from printing with pigments, 6) Emissions of textiles cleaned with perchloroethene, 7) Overview of the emissions of the sence, 8) Literature, 9) Calculation of the heights of exhaust gas outlets, 10) model permit conditions

4.3 Slaughterhouses/Animal by-products and Food/Milk Industry

4.3.1 Inception phase: Kick-off Meeting

Aim of the meeting: Information of all partners and stakeholders on the project goals and structure, preparation of project facilities and staff

Date: 5-6 December 2002

Place: Prague, Ministry of Environment

Participants:

Representatives of ministries of the environment and agriculture; regional authorities

Dr. Wieting, Federal Environmental Agency; Dr. Weichgrebe, University of Hanover, German experts

Results:

The Kick-off Meeting has been used to gather information on the current state of the implementation of the IPPC-Directive in the Czech Republic.

An agreement was made how to handle the preparation of the different future steps as to structure and content. For both branches “Food and Milk” and “Slaughterhouses and Animal By-products”, it was agreed to select “Milk process” and “Slaughtering of big animals” to be treated in the workshops, seminars, and simulation processes.

4.3.2 Preparation of the Workshops

Aim of the meeting: Preparation of the workshops and supporting documents for both branches

Date: 21-22 January and 12-13 February 2003 for the Workshop on Slaughterhouses and Animal By-Products
23-24 January and 14 February 2003 for the Workshop on Food and Milk

Place: Prague, Ministry of Environment

Participants:

Ministry of the Environment; regional authorities; Agency of Integrated Permitting; Czech Environmental Inspectorate
Dr. Wieting, Federal Environmental Agency; Dr. Weichgrebe, University of Hanover, German experts

Results:

During the first mission, the experts discussed the time schedule, organization, and speakers of the workshops. The Czech side proposed to combine the two workshops on slaughterhouses and animal by-products and food and milk, because the audiences would be almost identical. Moreover, guideline materials in application of BAT/BREFs on slaughterhouses and animal by-products, food, and milk were drafted. The day after the meeting with the Czech experts, the German experts prepared this material for integration in the "Guide for the Determination and Application of BAT in Licensing Procedures", which has been prepared in the Twinning project CZ2000/IB/EN-01 (activity no. 8.2/8.3; November 2002).

During the preparation of the workshop, it was agreed to make a technical tour to the slaughterhouse Maso Planá a.s., which has been selected for the simulation of a pilot permit, and to a dairy in Planá nad Lužnicí.

The second missions of the activities 2.3 and 2.5 in February 2003 were used for preparing the presentations and co-ordinating them with the MoE.

The experts also discussed the preparation of a Czech version of the BREFs for Slaughterhouses and Animal By-products and Food and Milk. The European Integrated Pollution Prevention and Control Bureau (EIPPCB) in Seville, Spain prepares the BREFs. No final BREFs are yet available for Slaughterhouses and Animal By-products and Food and Milk. Only the second drafts of the BREF documents on Slaughterhouses and Animal By-products and Food, Drink and Milk are now available on the website of the EIPPCB. The final BREFs were not available before the end of this Twinning Light project. Moreover, only Mr. Vondraček, Ministry of Agriculture, represents the Czech TWG on Slaughterhouses and Animal By-products and Food and Milk in the EIPPCB. Therefore, the Czech staff could not work out a Czech version of BREFs on Slaughterhouses and Animal By-products and

Food and Milk during this project. This will happen after this project with the material and the knowledge of the workshop and the seminars.

4.3.3 Workshop on the Application of BAT/BREF to Slaughterhouses and Animal By-products and to Food and Milk

Aim of the meeting: Consultation of materials for the guideline on the application of BAT/BREFs to Slaughterhouses and Animal By-products and to Food and Milk

Date: 10-14 March 2003

Place: Prague, Ministry of Environment,

Participants:

Ministry of Environment; regional authorities; Agency of Integrated Permitting; Czech Environmental Inspectorate
Dr. Wieting, Dr. Weichgrebe, Mr. Bertsch, Mr. Albrecht, and Mrs. Lindemann, German experts

Results:

The first day of the mission, the German experts visited together with Mr. Jungr (MoE), Mrs. Zagorová, Mrs. Malířová (AIP), Mr. Jelšík (Regional Authority South Bohemia) the dairy Madeta and the slaughterhouse Maso Planá in Planá nad Lužnicí.

The workshop was successful and took place in Palace Kodaňská, Prague, with more than 25 participants of the regional authorities and AIP. During the discussion of the presentations of the German experts, it turned out that the information would be helpful for permitting regarding IPPC. The Czech participants successfully solved the prepared case studies in two groups.

Draft guideline materials for the application of BAT/BREFs to slaughterhouses and animal by-products and food and milk were prepared by the German experts and discussed with the participants of the workshop. For integration in the “Guide for the Determination and Application of BAT in Licensing Procedures”, it was decided that this material would be collected and sent by Mr. Hermann, Federal Environmental Agency, to Mr. Ellermann, the Pre-Accession Adviser of the Twinning project CZ2000/IB/EN-01.

After the workshop, the Guidance materials on BAT/BREF application for Slaughterhouses/Animal-By-products/Food/Milk have been sent to Mr. Ellermann. They will be published as an Annex to the “Guide for the Determination and Application of BAT in Licensing Procedures”. Therefore, the tasks of the contract were fulfilled.

4.3.4 Seminar on Slaughterhouses and Animal By-products

Aim of the meeting: Carrying out a seminar on Slaughterhouses and Animal By-products with participants from IPPC-installations. Contents of the seminar should be:

- General information on IPPC
- Application of BAT/BREF to slaughterhouses and animal by-products
- Expert panel (open discussion) and information on this issue from the Member State

Date: 27 May 2003

Places: Prague, Ministry of Agriculture

Participants:

ministries of environment and agriculture; AIP; regional authorities; representatives of various Czech rendering companies and slaughterhouses Mrs. Lindemann; Mr. Rörig, German experts

Results:

The seminar was successful. More than 30 representatives of the authorities and Czech rendering companies and slaughterhouses attended the seminar. The closing discussion turned out that the given lectures were well prepared and adequate. The information given by the German experts as well as the representatives of the Czech ministries will be helpful for preparing applications regarding IPPC.

4.3.5 Seminar on Food and Milk

Aim of the meeting: Carrying out a seminar on Food and Milk with participants from IPPC-installations. Contents of the seminar should be:

- General information on IPPC
- Application of BAT/BREF to food and milk
- Expert panel (open discussion) and information on this issue from the Member State

Date: 14 May 2003

Places: Olma, dairy plant

Participants:

Ministry of Environment; Ministry of Agriculture; AIP; representatives of Czech milk and food industry Mrs. Lindemann; Mr. Bertsch, German experts

Results:

Approximately 20 participants attended the seminar from the authorities and the Czech food and milk industry. During the discussion of the presentations

of the Czech and German experts, it turned out that the presented information would be helpful for the permitting of IPPC installations of the Czech food and milk industry. The final discussion showed that the integrated permitting procedure is a difficult process and that the support of the German experts was really helpful. The seminar was successful and no further activity in this area is necessary.

4.3.6 Simulation of Integrated Permitting for an Installation from IPPC Category 6.4 or 6.5

The aim of the activity was to develop the necessary documents for the future IPPC permitting process through the simulation of the procedure of a pilot permit issuing for an individual installation from IPPC category 6.4 (a) or 6.5 (slaughterhouses and animal by-products) and category 6.4 (b) or (c) (food and milk).

4.3.6.1 First Mission

Aim of the meeting:

- Filled application form for the integrated permit on the relevant installation
- Guidance material for filling out of an application for IPPC for the relevant industrial sector

Dates: 20 January and 11 February 2003

Place: Prague, Ministry of Environment

Participants:

Ministry of Environment; Ministry of Agriculture; regional authorities; Agency of Integrated Permitting; Czech Environmental Inspectorate; Food Research Institute; Maso Plana a.s.; Olma a.s.

Dr. Wieting, Federal Environmental Agency; Dr. Weichgrebe, University of Hanover, German experts

Results:

The meetings were well prepared by the Czech side. The Czech Ministry of Environment had selected the companies Maso Plana a.s. for the simulation of the permitting according to the IPPC-Directive category 6.4 (a) or 6.5 (slaughterhouses and animal by-products) and Olma a.s. for category 6.4 (b) or (c) (food and milk). The companies prior to the meetings had filled out the application for an integrated permit.

During the meetings, the applications were discussed with the Czech authorities and the Czech companies. The first result of the meeting was that there are number of points in the permitting procedure which have to be clarified:

- How detailed should be the flow sheets of the processes and which kind of information should be given with them?
- How should one proceed correctly for the assignment to the categories of Annex I?
- How can the authorities determine the facts of the application/permit?
- How can odour emissions be verified or measured?

Therefore, a presentation about the assignment to the categories of Annex I in Germany was desired for the workshop. It seemed that odour emissions from slaughterhouses were not thoroughly considered in the Czech Republic so that this topic should also be discussed in detail during the workshop.

Moreover, predictions about noise and air were necessary to clarify: How can these predictions be arranged and which assessment or measuring points form the foundations for this?

The first meeting of the activity simulation of the categories 6.4 and 6.5 was successful for all participants. The companies agreed to revise the applications and to submit the missing documents, predictions and flow sheets.

Independently from this Twinning Light project, guidance for filling out of an application form has been published by the Czech Ministry (Ordinance No. 554 of 16 December 2002).

4.3.6.2 Preparation of the Public Hearing

Aim of the meeting: Preparation of the public hearing

Dates: 14 March 2003

Participants:

Ministry of Environment; regional authorities; Agency of Integrated Permitting; Czech Environmental Inspectorate;
Dr. Wieting, Dr. Weichgrebe, Mr. Bertsch, Mr. Albrecht and Mrs. Lindemann, German experts

Place: Prague, Ministry of Environment

Results:

The preparation of the public hearings was discussed during the meeting. The revised applications and the statements of the Agency of Integrated Permitting were not available for the German experts in German before the meeting.

4.3.6.3 Public Hearing on Slaughterhouse Maso Plana a.s.

Aim of the meeting:

- Statements of concerned authorities
- Public hearing on an application and permit conditions proposal

Dates: 02 - 03 April 2003

Participants:

Ministry of Environment; regional authorities; Agency of Integrated Permitting; Food Research Institute; Maso Plana a.s.

Mr. Albrecht, Mrs. Lindemann, German experts

Place: Jihočesky Kraj-Krajský úřad, České Budějovice

Results:

The meeting was successful. The concerned authorities presented their statements. All statements on the application have to be made by the regional authority in writing. The existing documents for the application of Maso Plana were incomplete. At the second day of the meeting, a lot of special questions have been discussed with the representatives of the regional authority about air and water pollution in slaughterhouses and special problems in Maso Plana, technical measures for air pollution control in slaughterhouses and smokehouses, and the conclusions of the public hearing. During the discussion of the presentations of the German experts, it turned out that the information about the application of Maso Plana would be helpful for permitting regarding IPPC.

For future permits, it will be necessary to talk with the applicant about the contents of the application before the beginning of permitting procedure. For making an application for a permit, it is advisable to use uniform, official forms, such like those used in Germany. Further, it is necessary to involve all concerned authorities (also those from other sectors) at an early stage for checking the completeness of the application for a permit.

4.3.6.4 Public hearing on Milk Plant Olma a.s.

Aim of the meeting:

- Statements of concerned authorities
- Public hearing on an application and permit conditions proposal

Dates: 05-09 May 2003

Participants:

Ministry of Environment; regional authorities; Agency of Integrated Permitting; Olma a.s.

Mr. Bertsch, German expert

Place: Ministry of Environment, Prague

Results:

The German expert prepared the public hearing and the simulation of statements of concerned authorities. In this context, a meeting took place in AIP to discuss the requirements of a permit for the big Czech dairy company Madetta a.s.. Questions related to integrated permitting on other food sectors have been discussed with the MoE. The German expert prepared a draft integrated permit for the dairy Olma a.s.. The draft of an integrated permit in the area of milk processing was discussed with AIP.

Mr. Jungr (MoE), Mrs. Svobodová and Mrs. Zagorová (AIP) were trained in integrated permitting. Many different questions about the application were discussed and solved. Therefore, the tasks of the contract were fulfilled.

4.3.6.5 Finalization of Permit for Olma a.s.

Aim of the meeting: Pilot permit for the relevant installation

Dates: 12 – 16 May 2003

Participants:

Ministry of Environment; Agency of Integrated Permitting; Olma a.s.
Mr. Bertsch, German expert

Place: Prague, Ministry of Environment

Results:

The finalisation of permit was successful. A draft of an integrated permit in the area of milk processing was discussed with the company Olma a.s.. The comments of the participants in the meetings were checked and the final draft was finished.

Mr. Jungr (MoE), Mrs. Svobodová, and Mrs. Zagorová (AIP) were trained in integrated permitting. Many different questions about the application were discussed and solved. The simulated permit shows all aspects of a real permitting process. The dairy, AIP, and the regional authority are able to solve the problems in the process of integrated permitting.

4.3.6.6 Finalization of Permit for Maso Plana a.s.

Aim of the meeting: Pilot permit for the relevant installation

Dates: 22 – 23 May 2003

Participants:

Ministry of the Environment; South Bohemia Regional Authority; Agency of Integrated Permitting; Maso Plana a.s.
Mr. Albrecht, Mrs. Lindemann, German experts

Place: Prague, Ministry of Environment

Results:

The German experts prepared a draft permit for the slaughterhouse Maso Plana a.s.. The draft of an integrated permit in the area of slaughterhouse processing was discussed with MoE, AIP, representatives of the South Bohemia Regional Authority and representatives of the company Maso Plana a.s.. The comments of the participants in the meeting were checked and the final draft was finished. Many different questions about the application were discussed and solved. The simulated permit shows all aspects of a real permitting process and so the activity is completed. The finalisation of the permit was successful.

After the meeting, Maso Plana a.s. has informed the responsible authority that it would like to step out of the permitting process.

4.3.7 Study visit to Member State (Focused on Slaughterhouses, Food, and Milk Industry)

Aim of the meeting: Study visits of appropriate IPPC installations regarding to nos. 6.4 and 6.5 of the annex I of the Directive

Date: 24-27 March 2003

Places: Schmalfeld and Barmstedt (dairy plants); Bad Bramstedt and Naumburg (slaughterhouses)

Participants:

Ministry of Environment; Ministry of Agriculture; Agency of Integrated Permitting; Regional Authority South Bohemia
Mr. Wieting; Mrs. Lindemann; Mr. Bertsch, German experts; Association of German Milk Industry; Northern Germany Co-operative; Regional Authority Halle

Results:

Plant visits have been carried out together with the plant operator and the local permitting authorities. The operators explained their concerns regarding integrated permitting. The best available techniques in the visited plants were shown to the visiting group from the Czech Republic. The permitting authorities described the requirements imposed on plant operators to obtain IPPC-based permits.

The discussion on environmental techniques was very open on the part of industry and all technical details were explained to the visitors. The Czech experts made ample use of camera and video equipment.

The results of the information exchange will help permitting authorities in the Czech Republic to better formulate environmental requirements for the plants concerned and improve the implementation of the IPPC Directive in this sector of industry.

5. Evaluation of the Twinning Light Project

The project has been carried out as planned without relevant obstacles or drawbacks. All arrangements and activities have been made in agreement and in close co-operation with the Czech partners. The aims and the benchmarks of the project have essentially been achieved.

5.1 Implementation of Article 17 of the IPPC-Directive: In the course of the project, an assessment of article 17 of the IPPC-Directive has been made together with the Czech partner. The activities were focused on the transboundary information exchange on the transboundary effects of environmentally relevant projects and plans. As an example case for transboundary information exchange, the German expert referred to the trilateral agreement between Germany, France, and Switzerland in the Upper Rhine Area. In a workshop with about 40 participants, the German experts presented the procedures in a Member State for the implementation of article 17 of the Directive and provided advice on options for the Czech Republic for transboundary co-operation with its neighbouring states in this area. Due to a recommendation of the workshop, the Czech-German Common Environmental Commission has decided to hold an expert meeting for the determination of the need for a regulation for this purpose.

5.2 Textile Processing: In the course of the project, guidelines on the IPPC permitting procedure and a seminar were prepared by a workshop. Especially in the seminar, the operators of textile industry as well as the staff from permitting authorities became acquainted with the fields of the IPPC-Directive, the Czech IPPC-Act, IPPC permitting procedure and BATs.

Guidance for the filling out of an application form has been published by the Czech Ministry (Ordinance no. 554 of 16 December 2002). Therefore, no further activities concerning this point have been necessary. Because of the incompleteness of the submitted pilot application form of the TIBA Company, further information was necessary for an assessment and the permitting procedure has been interrupted as foreseen by the Czech legislation.

In agreement with all partners, the work was focussed on model permitting conditions based on a proposal presented by the STEs. This model conditions have been discussed in the light of comments of Czech authorities concerned with the assessment. Because of time and budget reasons, a final adaptation to the Czech legislation was not possible within this project and will be carried out by the Czech experts. It is intended to publish the revised model permitting conditions as a recommendation subsequently.

5.3.Slaughterhouses and Animal By-products/Food and Milk: In the course of the project, guideline materials on the IPPC permitting procedure and two seminars were prepared by a workshop. Especially in the seminars, the operators of slaughterhouses/plants for animal by-products/food and milk plants as well as the staff from permitting authorities became acquainted with the fields of the IPPC-Directive, the Czech IPPC-Act, IPPC permitting procedure and BATs.

Guidance for the filling out of an application form has been published by the Czech Ministry (Ordinance no. 554 of 16 December 2002). Therefore, no further activities concerning this point have been necessary.

6. Conclusion and Recommendations

The following results have been expected from the twinning light project:

- Business sectors (especially food and milk industry, slaughterhouses and textile industry) well informed and ready to enter the IPPC regime (seminars, workshops).
- Guidance materials on BAT/BREF application (discussed with the representatives from the relevant Czech industry) for the three areas: Slaughterhouses and Animal By-Products, Food and Milk Processes and Textile Processing.
- Final Czech version of BREFs in selected areas: Slaughterhouses and Animal By-products, Food and Milk Processes.
- Guidance materials of preparing applications for integrated permits, filled application forms, pilot permits for three IPPC installations (from textile industry, food and milk industry and slaughterhouses – category 6.2, 6.4 and 6.5 according to the Annex I of the Directive 96/61/EC on IPPC).
- Staff from permitting authorities (Regional Authorities) and other concerned IPPC bodies (Czech Environmental Inspectorate, Agency, Regional Hygiene Officers etc.) trained in the areas of textile industry, food and milk industry and slaughterhouses through pilot permitting.
- Implementation requirements of article 17 of the IPPC-Directive (on transboundary effects) have been applied.

The project has been carried out as planned. The expected results have generally been achieved:

1. Implementation of Article 17 of the IPPC-Directive:

Implementation requirements of article 17 of the IPPC-Directive on transboundary effects have been discussed with the relevant stakeholders in the Czech Republic. The concerned authorities have been trained to apply article 17 of the IPPC-Directive in the future. None of the plants, which have been selected for the simulation games, had transboundary effects. Therefore, article 17 has not been applied in this project.

2. Textile Industry:

- The textile industry has been informed by a workshop and a seminar and has been prepared to enter the IPPC regime.
- Guidance materials on BAT/BREF application for textile processing have been prepared during the project and have been discussed with the representatives from Czech industry.
- Guidance for the filling out of an application form has been published by the Czech Ministry (Ordinance no. 554 of 16 December 2002). An application form has been filled out by the TIBA Company. Because of the

incompleteness of the submitted pilot application form of the TIBA Company, further information was necessary for an assessment and the permitting procedure has been interrupted as foreseen by the Czech legislation. In agreement with all partners, model-permitting conditions have been prepared by the STEs. This model conditions have been discussed in the light of comments of Czech authorities concerned with the assessment. Because of time and budget reasons, a final adaptation to the Czech legislation was not possible within this project and will be carried out by the Czech experts. It is intended to publish the revised model permitting conditions as a recommendation subsequently.

- The staffs from permitting authorities (Regional Authorities) and other concerned IPPC bodies (Agency for Integrated Permitting) have been trained in the area of textile industry through pilot permitting.

3. Slaughterhouses and Animal By-Products/Food and Milk:

- The slaughterhouses, animal by-products industry, food industry, and milk industry have been informed by seminars and have been prepared to enter the IPPC regime.
- “Guidance Materials on BAT/BREF Application to Slaughterhouses/Animal By-Products/Food/Milk” have been prepared during the project and have been discussed with the representatives from Czech industry. The material will be published as an Annex to the “Guide for the Determination and Application of BAT in Licensing Procedures”, which is prepared in the Twinning project CZ2000/IB/EN-01.
- The European Integrated Pollution Prevention and Control Bureau in Seville, Spain prepares Best Available Techniques Reference Documents. No final BREFs are yet available for Slaughterhouses and Animal By-products and Food and Milk. Therefore, the Czech staff could not work out a Czech version of BREFs on Slaughterhouses and Animal By-products and Food and Milk during this project. This will be done after the project with the material and the know-how gained in the workshop and the seminar.
- Guidance for the filling out of an application form has been published by the Czech Ministry (Ordinance no. 554 of 16 December 2002). The companies Maso Plana a.s and Olma a.s. have filled out application forms. Draft pilot permits have been prepared for the companies Maso Plana a.s. and Olma a.s.. The draft pilot permit for Maso Plana a.s. will be published in the “Guidance materials on BAT/BREF Application to Slaughterhouses/Animal By-Products/Food/Milk”.
- The staffs from permitting authorities (Regional Authorities) and other concerned IPPC bodies (Agency for Integrated Permitting, Czech Environmental Inspectorate, Food Research Institute) have been trained in the area of slaughterhouses, animal by-products, food, and milk through pilot permitting.

Recommendations

1. During the drafting of the project proposal and the contract, it became obvious that the requirements of the project fiche relating to the working days of the experts of the Member State were no longer adequate. Moreover, the per diem for the Member State experts was raised from 193€ to 274€ by the Commission in the time between the preparation of the project proposal and the contract. Therefore, the Member State proposed some changes to the work schedule for the experts. This led to a lengthy discussion with the Commission and a considerable delay in the start of the project. Twinning light projects operate in a dynamic context. It is recommended that in future twinning light projects the Commission demonstrates more flexibility for the drafting of the contract.
2. Unlike twinning projects, there was no full time project assistant (CC national) for the twinning light project, which could deal with local project management, translation, and interpretation. Project management, therefore, had to be done by the administrations of the Member State and the Final Beneficiary. This created an additional burden for both administrations and made procedures for e.g. translations and interpretation rather cumbersome. It is recommended to employ a full time project assistant in future twinning light projects.
3. The twinning light project had a budget of 150,000 €. It turned out during the drafting of the contract and the implementation of the project that this sum was too limited to cover all necessary activities. Additional funds would have been necessary for a technical assistant/interpreter, for interpretation, for translations, for refreshments/meals during workshops/seminar/simulation exercises, for the rent of meeting rooms, and for a final meeting of the participants of the project. In a Note to all Contact Points for Twinning in both Member states and Acceding countries on the Clarifications/amendments to twinning light rules of 28 March 2003, Matthias Ruete announces that in future twinning light projects the financial ceiling would be raised to 250,000€. Based on the experiences with this twinning light project, this is highly appreciated.
4. According to the twinning regulations, budget reallocations between budget sections for a cumulated amount of up to 10% of the total budget of the twinning light project can be made without prior approval by the Commission and the CFCU. Budget reallocations between budget sections for a cumulated amount beyond 10% of the total budget of the twinning light project require prior approval by the Commission and the CFCU. For the twinning light project, with a rather small budget of 150,000 € this limit was quickly reached. Budget reallocations, therefore, needed the prior approval of the Commission and the CFCU. This procedure turned out to be very time-consuming and led to delays in the implementation of the necessary changes. According to German administrative procedures, budget reallocations between budget sections for a cumulated amount of up to 20% of the total budget can be made without prior approval by the contracting authority. It is recommended that in future twinning light projects budget reallocations between budget

sections for a cumulated amount of up to 20% of the total budget can be made without prior approval by the Commission and the CFCU.

II. Comments by the Final Beneficiary

The co-operation with the German short-term experts was on a very good level and all of the expected results were achieved. For example, the textile BREF workshop for the state administration and representatives of textile industry was successful and the discussion between all participants was productive. The short-term experts presented and explained the concept of an emission factor for the textile industry and it was judged as effective. During the study visits, the Czech experts had a possibility to visit interesting installations in Germany and discuss the detailed questions of the BAT applications and the permitting procedure. The guidelines, which were developed during the project, are considered as useful, but a slight adaptation to formal aspects of the Czech legislation might be necessary. The Czech experts will appreciate additional co-operation with the German short-term experts, for example in bilateral projects.

Abbreviations

AIP	Agency for Integrated Permitting
ATI	Association of Textile Industry
BAT	Best Available Techniques
BREF	Best Available Techniques Reference Documents
CR	Czech Republic
EIPPCB	European Integrated Pollution Prevention and Control Bureau
IPPC	Integrated Pollution Prevention Control
IRZ	Integrated Pollution Register
MoE	Ministry of Environment, Czech Republic
MS	Member State
STE	Short-Term Expert
TWG	Technical Working Group