



An EU funded project

Improvement of hazardous waste management in the Republic of Serbia - IHWMS

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Workshop on Integrated Waste Management Plans

22nd of October 2015

**Draft results on the Institutional Set-Up
for Hazardous Waste Management**

Content

- Aim of the Activity on the Institutional Set-Up on Hazardous Waste Management in Serbia
- Interviewed Institutions
- Status on the Update and elaborated Draft Recommendations

Aim of Activity 2.1: Update Institutional Set-Up

- Update and assess responsibilities & procedures for the permitting & inspection of the storage/treatment and collection/transport of HW (including HW from households)
- Perform single meetings with relevant stakeholders
- Assess staff available for permitting and inspection
- Elaborate recommendations for further better approach
- Drafting a study on the institutional set-up of hazardous waste management in Serbia

Involved Institutions via Interviews

- Ministry of Agriculture and Environmental Protection
- Ministry of Labour, Employment, Veteran and Social Affairs
- Ministry of Construction, Transport and Infrastructure
- Serbian Agency for Environmental Protection (SEPA)
- Local Self-Governmental (LSG) Unit
 - City of Belgrade
 - Municipality Pozarevac
 - Municipality Gornji Milanovac
- Autonomous Province (AP) Voivodina
- Expert Waste Testing Organizations
 - Laboratory MOL Ltd.
- Accreditation Body of Serbia (ATS)
- Standing Conference of Towns and Municipalities (SCTM)
- Statistical Office

Field of interests:

- General structure of the organization
- Organisational procedures
- Capacities
- Waste related responsibilities
 - Involvement in the Serbian hazardous waste management
 - Current difficulties/limitations

Draft Recommendations

Co-operation and information exchange:

- Perform **regular meetings** of MAEP with relevant representatives of the **Chamber of Commerce**.
- Intensify **co-operation** of MAEP **with other Ministries** especially in terms of joint **inspections**.
- **Involve** the **Legal Department** at the MAEP responsible for Waste Legislation to high extent in the TWINNING project.

Draft Recommendations

Educational training:

- All **authorities issuing permits and carrying out inspections should be trained**. This would improve and harmonize e.g. the quality of the permits in terms of comprehensive and uniform issuing.
- Specific **waste related aspects** should also be part of overall environmental trainings (for IPPC and Seveso issues).
- Trainings should be **organized in cooperation** with the Standing Conference of Towns and Municipalities.
- **Intensify education** of the responsible persons for waste at the **Company Level**.

Draft Recommendations

Permitting procedure I:

- Preferred option: All permits, also concerning collection/transport and storage/treatment of non-hazardous waste should be issued by the MAEP (except the permits issued by the Autonomous Province of Voivodina). Optional there could be fixed a possibility of delegating the permitting procedure (hazardous and non-hazardous waste) in the Law on WM to certain self-governmental units (e.g. to the City of Belgrade).
- Permits for IPPC installations should be granted on the Ministry Level only (except the permits issued by the Autonomous Province of Voivodina).

Draft Recommendations

Permitting procedure II:

- The introduction of **concentrated permitting procedures** should be evaluated covering all relevant Laws concerned.
- **Update of the Rulebook** including **templates for permits** with **minimum requirements** in accordance with Article 64 of the Law on WM.
- Minimum **standards for the internal permitting procedure** in accordance with the Rulebook should be introduced for all authorities concerned.
- The permits should always **refer to the project documentation** the permits are based on.

Draft Recommendations

Inspection procedure:

- **Establish good co-operation** between MAEP Inspectorate and Police / Ministry of Construction, Transport and Infrastructure for inspections on illegally activities (transport, treatment).
- The **Waste Inspectors should visit every location** in frame of the permitting procedure respectively substantial changes to the facility.
- It should be investigated in detail to which extend provisions on joint inspections could be introduced e.g. as a **Memorandum of Understanding** (especially in terms of IPPC activities and occupational safety).
- In terms of **paying out incentives for recycling activities** it is recommended to **check the quality of recycling / the material produced**.

Draft Recommendations

Other general findings:

- **Identification of Asbestos during Inspections:** Companies carrying out de-construction should provide information on the year of construction as the relevant timeframe for using asbestos is limited. This would improve the quality of inspections and treatment of such waste.
- **Installation of collection points:** Enforcement of measures in the Serbian Law on WM and related MO to introduce collection points and better up separate collection of WEEE and batteries (and other waste streams).
- **Local and regional waste management plans:** Enforcement of the introduction of regional and local waste management plans.

Thank you!

Gernot Lorenz, Andreas Moser, Christian Neubauer

MS Experts, Austria