



Republic of Serbia
Ministry of Energy, Development and
Environmental Protection

Challenges faced by the Republic of Serbia with regard to the to implementation of CLRTAP Protocols

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Capacity building activity

The project ***Implementation and Ratification of the Protocol on Heavy Metals, the Protocol on Persistent Organic Pollutants and Gothenburg Protocol*** for Western Balkan countries funded by the Netherlands and coordinated by UNECE to support the implementation of the CLRTAP has been completed with following major outputs for the Republic of Serbia

- ❖ The elaboration of the National Action Plan for the implementation and ratification of three most recent CLRTAP Protocols
- ❖ Ratification of the 1998 HM and the 1998 POPs Protocol on March 2012
- ❖ Promotion of the implementation of the Convention



National Air Protection Legislation in line with EU acquis and Protocols

Since 2009 Republic of Serbia has achieved great success in the field of air protection by adopting the Law on Air Protection, IPPC Law (2004) and numerous by-laws dealing with air emission and air quality issues

- ❖ **LCP Directive** is in advanced stage of transposition with monitoring score of 74%. Full implementation of the LCP Directive is not yet determined
- ❖ **IPPC Directive** is fully transposed 100% into Law on IPPC and the relevant by-laws. Full implementation depends on IPPC permitting
- ❖ **VOCs Petrol Directive** and **Stage II VOCs Petrol Directive**, transposition into national legislation is 100%. Predicted deadline for implementation of the Directives requirements are 2023 i.e. 2020.
- ❖ Transposition status of **VOC Solvents Directive** is around 88%. Year 2023 foreseen for full implementation
- ❖ **National Emission Ceiling** shall be determined by the end of 2015
- ❖ Progress is made in respect of implementation of **Quality of Petrol Directive** 98/70/EC
- ❖ Requirements of **Sulphur Content Liquid Fuels Directive** still need to be achieved
- ❖ A legal basis was provided for implementation of the POPs **Regulation 850/2004/**
- ❖ Several by-laws regulating the field of waste management transposing **End-of-Life Vehicles Directive**, **WEEE Directive**, **PCB/PCT Directive** and **Batteries Directive** in a significant percentage → *implementation in progress*



Important National Strategies, Policies and Programmes

- ❖ *National Programme for the Adoption of the Acquis – NPAA (2013–2016) was prepared in the beginning of 2013*
- ❖ *National Environmental Approximation Strategy for Serbia (October 2011) contains an overview of economic instruments and financial mechanisms in the field of environment*
- ❖ *Energy Development Strategy until 2015 (adopted 2005). The new Energy Development Strategy of the Republic of Serbia by 2025 with projections until 2030 is in preparation*
- ❖ *Energy Balance of the Republic of Serbia for 2012*
- ❖ *National Implementation Plan for the Stockholm Convention (2010) planned to be updated in line with the obligation arising from the Regulation 850/2004*
- ❖ *Waste Management Strategy for the period 2010 - 2019*
- ❖ *Draft National plan for managing waste batteries and accumulators, Draft National plan for managing waste from electrical and electronic equipment prepared*
- ❖ *Development of the National plan for medical waste management is in progress*



Reporting obligations

- ❖ Data collection started in 2007 establishing the Register of polluters. The Information system of the National Register of pollution sources was completed in 2012
- ❖ Reporting obligations are set also under PRTR Protocol ratified by Serbia in 2011
- ❖ Serbian CLRTAP Inventory for the period **2000 to 2010** reported in 2012
 - first year that Serbia reported emission data for all relevant pollutants covered by 3 most recent Protocols together with IIR document.
- ❖ During 2012 Serbia established the emission inventory covering the period **1990 - 2011**. The EMEP/EEA methodology is used
- ❖ Emissions of air pollutants originated from road transport have been recalculated for the period 1990 - 2011 using new version of COPERT IV model
- ❖ Emissions per EMEP grid and projections were not reported until now → Expert support and practical trainings on this matter would be of help
- ❖ Difficulties we are facing: limited administrative capacities (only 2 people worked on the inventory preparation), lack of reliable statistical data mainly for agriculture sector, national emission factors not developed... → Expert support and financial support is needed for further improvement of inventory





Obligations related to ELV and BAT

- ❖ ELVs for air pollutants from stationary sources (LCP, medium and small combustion plants) and certain types of installations (TA Luft 2002) are set by the national regulation
- ❖ Preliminary list of the existing installations subject to integrated permitting in the Republic of Serbia

Total 161 installations / 6 issued

*3 cement industry
2 metallurgy
1 chemical industry*

108 applications for IPPC permit are in procedure

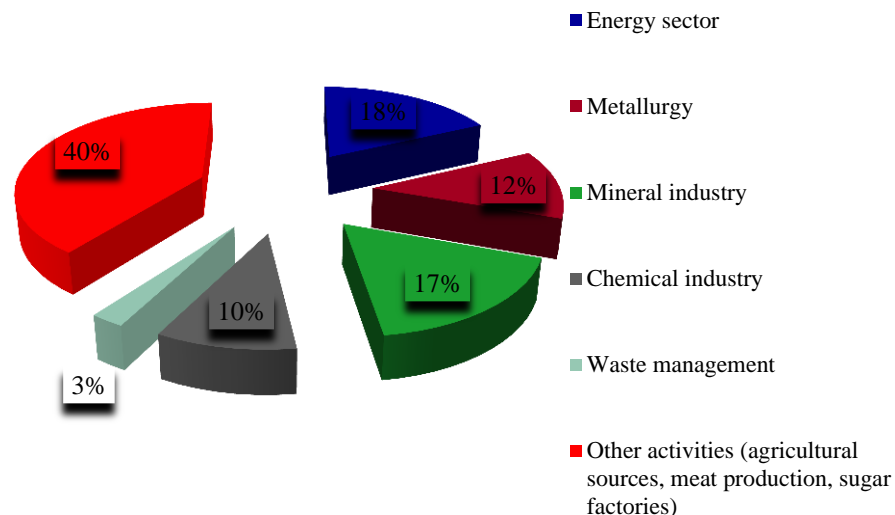
❖ 3 levels of competence for issuing permits (M,P,L)

❖ Assessment of compliance with BAT requirements

will be possible after completing permitting process by majority of existing installations subject to IPPC Law

❖ Deadline set by IPPC Law for issuing all IPPC permits for existing installations end of 2015 → **unrealistic** → should be postponed with the amendments of the IPPC Law by 2020

IPPC installations in Serbia





Challenges and future steps in the implementation process

- ❖ Republic of Serbia was in non-compliance in accordance with lead content of marketed petrol. Since 2010 significant progress has been achieved → 0,013 g/l
- ❖ Ratification of the 1999 Gothenburg protocol is postponed → Analysis of the Protocol provisions has shown that Serbia is currently in non-compliance with the requirements of the sulphur content in gas oil
- ❖ Reliable estimations on National Emission Ceilings for the year 2020 couldn't be performed, due to significant uncertainties within the process of complying with the ELVs for the LCP sector
- ❖ New Energy Development Strategy will clarify issue of compliance of the energy sector with ELVs, which will provide for more realistic bases for NEC estimations
- ❖ Until now, none of LCP installation submitted IPPC request → deadline for submission is end of 2013
- ❖ The adoption of the amendments of the IPPC Law would provide for the extension of the period for integrated licensing to the existing facilities
- ❖ Lack of compliance of the LCP sector with ELV for SO₂, NO_x and dust. Most problematic are SO₂ emissions from combustion plants using coal with high S-content. Only several LCP installations have equipment for continuous measurement of emissions



Challenges and future steps in the implementation process

- ❖ Power and heat generation facilities are, generally speaking, in a bad condition. Main reasons: maintenance delay / lack of investment over the last two decades
- ❖ Estimated approximation costs of the investments in the air quality and climate change sector together are around €452 million (4% of total approximation costs in environmental sector) for the period until 2030 (*source: National Environmental Approximation Strategy for Serbia*)
- ❖ Electric Power plants of Serbia done a lot to achieve the environmental requirements by conducting several projects for the reconstruction of ESP, fuel gas desulphurization
- ❖ Study on a plant-by-plant analysis should be launched
- ❖ Serbia is currently discussing the possibility of developing the NERP as a flexible mechanism for implementation of LCP Directive.
- ❖ Problem with high-sulphur content in fuel still needs to be resolved
- ❖ At this point of view more in depth analysis for the Republic of Serbia are needed in regard to the accession of the Amended Protocols. UNECE assistance in this matter could be of help





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Thank you

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