



European Union Network for the Implementation  
and Enforcement of Environmental Law



# STRATEGIES FOR VERIFICATION OF SELF-MONITORING AND REPORTING ON AIR EMISSIONS WORKSHOP

## Analysis of the survey results

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IGAMAOT

28 September 2021

**igamaot**

Inspeção-Geral da Agricultura, do Mar,  
do Ambiente e do Ordenamento  
do Território

# Content of the presentation

## Registrations

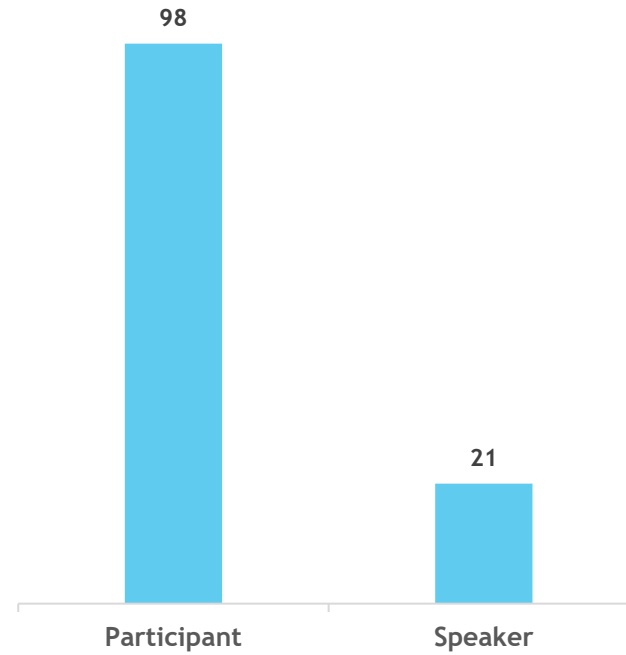
- Participants / Speakers
- Countries
- Organizations

## Workshop expectations

- Most relevant problems related to operator self-monitoring
- Main bottlenecks related with Operator self-monitoring air emissions
- Other topic related to operator self-monitoring (not only related to air emissions) the ToR 2022 of the IMPEL IED Implementation Project should cover
- Activities of the participants related to self-monitoring of the operator
- Interest in being part of the core team for the 2022 project

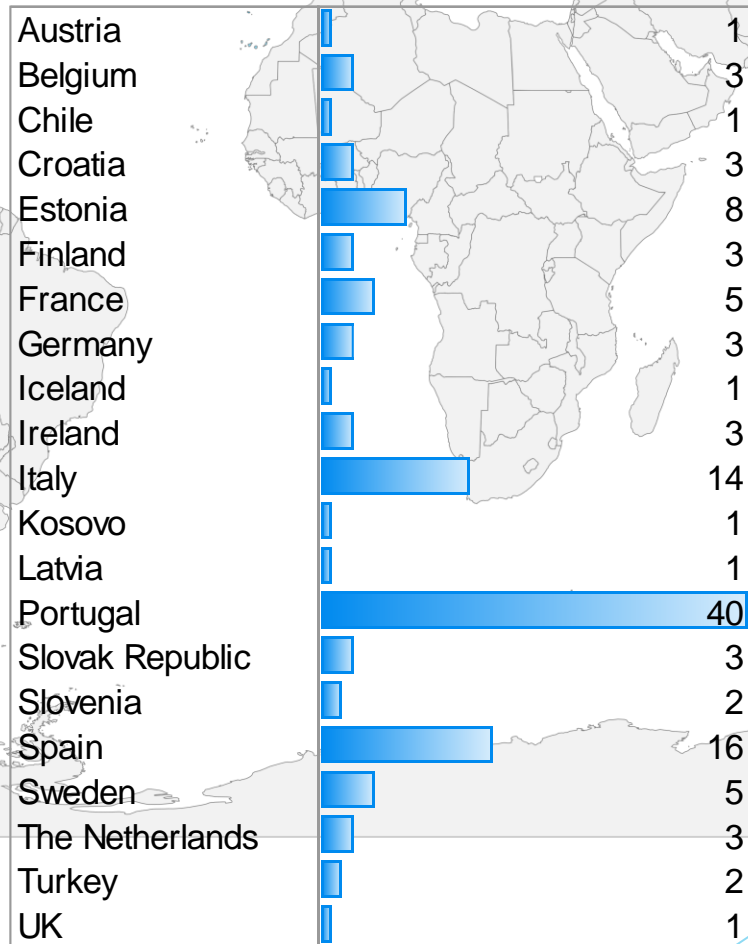
# Registrations

- ▶ 119 registrations  
(+ 5 duplicate)
  - ▶ 98 participants
  - ▶ 21 speakers



# Countries

- ▶ 21 countries
- ▶ Europe
- ▶ America





# Organizations

## ▶ Host by

- ▶ ARPA Sardegna, Italy
- ▶ IGAMAOT, Portugal

## ▶ Speakers (1<sup>st</sup> day - 28 September)

- ▶ General Inspection of Agriculture, Sea, Environment and Spatial Planning (IGAMAOT), Portugal
- ▶ IMPEL Chair
- ▶ European Commission - DGEnv - C4
- ▶ IMPEL - Project leaders
- ▶ Regional Agency for Environmental Protection (ARPA) of Sardegna, Italy
- ▶ Portuguese Environmental Agency (APA), Portugal
- ▶ European Commission - European IPPC Bureau
- ▶ Organisation for Economic Co-operation and Development (OECD)
- ▶ Commissions for Coordination and Regional Development (CCDRs), Portugal
- ▶ Ministry of the Environment, Finland
- ▶ Environmental Superintendency of Chile - International Network for Environmental Compliance and Enforcement (INECE)



# Organizations

## ▶ **Speakers** (2<sup>nd</sup> day - 11 October)

- ▶ Umweltbundesamt / Environment Agency Austria
- ▶ Superior Institute for Environmental and Environmental Research (ISPRA), Italy
- ▶ ARPA Lombardia, Italy
- ▶ Ministry of Environment and Sustainable Development, Croatia
- ▶ IGAMAOT, Portugal
- ▶ ARPA Sardegna, Italy
- ▶ Cologne District Government, Germany

## ▶ **Participants**

- ▶ National and Regional Environmental Agencies
- ▶ National and Regional Environmental Inspectorates
- ▶ Ministry of Environment
- ▶ Environmental Polices
- ▶ Public Prosecutors

# Workshop expectations (1)

**Which is the area related to operator self-monitoring your Agency has to tackle the most relevant problems?**

- ▶ 1<sup>st</sup> Reliability of data (57)
- ▶ 2<sup>nd</sup> Quality and representativeness of the samplings and analysis (52)
- ▶ 2<sup>nd</sup> Dealing with non-compliances detected in self-monitoring (52)
- BAT conclusions / Best Available Techniques
- Enforcement / Oversight
- Compulsory data availability
- Continuous Emission Monitoring System compliance check
- Reporting
- Legislative interpretations / Guidance
- Networking and exchange of best practice

# Workshop expectations (2)

**Where do you think the main bottlenecks related with Operator self-monitoring air emissions can be found?**

- ▶ 1<sup>st</sup> Representativeness of the samples (operating/capacity conditions, fuel and materials used) (66)
- ▶ 2<sup>nd</sup> Behaviour of the Operator (47)
- ▶ 3<sup>rd</sup> IED self-monitoring requirements (BREFs- REFerence documents / BAT - Best Available Techniques) (43)
  - Permits requiring very specific conditions
- ▶ 4<sup>th</sup> Accreditation of sampling and analysis methods (36)
  - Probability and quality of random external checks





# Workshop expectations (3)

**Which other topic related to operator self assessment (not only related to air emissions) the ToR 2022 of the IMPEL IED Implementation Project should, in your opinion, cover?**

- ▶ Expand self-monitoring project to wastewater, also continuous monitoring system
- ▶ How can the operator and the laboratory accredited to carry out tests be made co-responsible for the representativeness of the samples?
- ▶ How to ensure that self-monitoring analysis and IED reporting is as important as authorization and inspection (to place the burden of proof on operators, ensuring early screening and detection of the infringements)
- ▶ More focus on enforcement related to operator self assessment... on operator behaviour
- ▶ How to deal with no compliance in self-monitoring? ... Criminal relevance
- ▶ Fugitive emissions
- ▶ Building trust between operator and inspection body

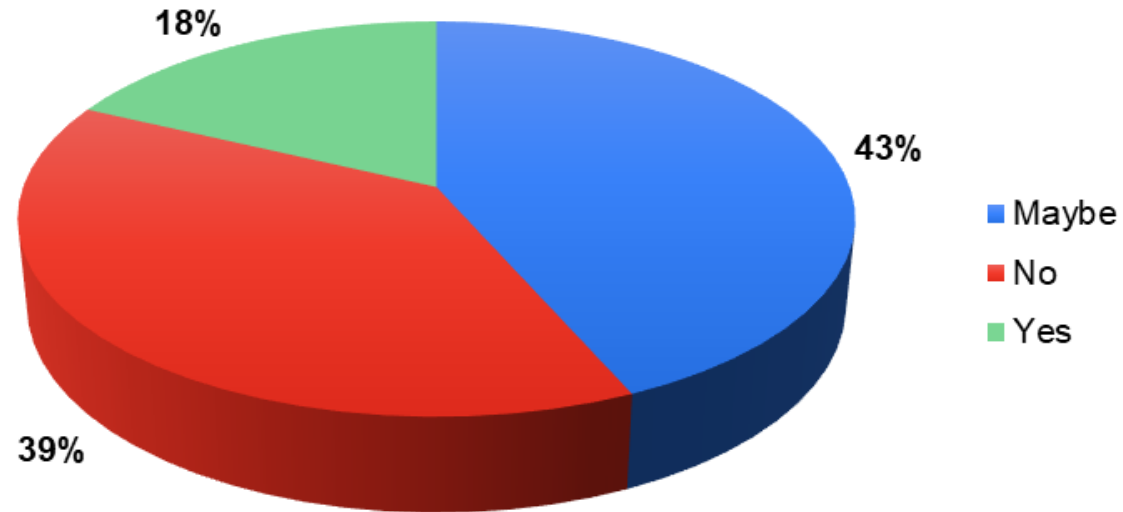
# Workshop expectations (4)

**In which of the following activities, related to operator self-monitoring, is your Agency involved?**

- ▶ 1<sup>st</sup> Analysis of self monitoring data provided by the operator (68)
- ▶ 2<sup>nd</sup> Indication of the self-monitoring requirements (frequencies, contaminants, methods, etc) to be included in the operator permit (59)
- ▶ 3<sup>rd</sup> Continuous Emission Monitoring System compliance check (according to EN 14181) (42)
- ▶ 4<sup>th</sup> Execution of air emission sampling and analysis complying with EN standards (29)
  - Law Enforcement / Inspections
  - Permitting / Permit compliance
  - Preparation of legislation / guidances
  - Compliance networking

# Workshop expectations (5)

Would you be keen to be part of the core team of the 2022 project?



▶ 61% have shown interest (19 Yes) in being part of the project core team in 2022



# Thank You!

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