



BEAC WGE, Subgroup on Hot Spots Exclusion (SHE)

Report on a capacity building workshop

**‘Raising awareness of Hot Spot related regional decision-makers and industry managers in the field of Best Available Techniques and Integrated Environmental Permits’
(Supporting Activity (SA) No 1 a)**

under

SA No1 ‘Preparing regional experts to apply the principles of BAT and the practical use of the Russian BREF documents for various branches’

October 2018

Moscow

Introduction

In 1994, the Barents Region Environment Action Programme was adopted by the Ministers of the Environment of the countries involved. In 2003, a report was released identifying 42 acute environmental problems in the Barents Region requiring urgent action (Hot Spots of the Barents region).

In 2005, the Ministers of Environment of the four Barents countries — Finland, Norway, Russia and Sweden — defined the goal to start launching investment projects in all of the Barents environmental Hot Spots by 2013 with the aim of eliminating these Hot Spots. In 2010, a procedure for exclusion of the 42 environmental hot spots from the Barents environmental Hot Spot list was presented to the Ministers of Environment.

At the same time, since early 2000s, the concept of Best Available Techniques (BATs) has been studied, tested and gradually introduced in the Russian Federation. In 2014, the Federal Law of July 21, 2014 No 219-FZ amending Federal Law No. 7-FZ ‘On Environmental Protection’ was passed. This Law is often called ‘the BAT Law’ of the Russian Federation since it introduced the concept of Best Available Techniques and Integrated Environmental Permits (IEPs). This opened opportunities for applying BAT principles for excluding installations from the List of Hot Spot based on the implementation of BATs and development of Environmental Performance Enhancement Programmes (EPEPs).

First IEPs have to be granted in Russia in 2019, and to prepare applications for such permits (including EPEPs) the Barents region stakeholders need urgent support.

This is why the Introductory Workshop (SA No 1 a) became the first event of the planned series of workshops / trainings organised within the framework of Supporting Activity No1 ‘Preparing regional experts to apply the principles of BAT and the practical use of the Russian BREF documents for various branches’.

Introductory Workshop 1 a Implementation Process

The Introductory Workshop (SA No 1 a) was aimed to:

- 1) raise awareness and build capacity of decision-makers (such as heads of territorial units of the Federal Supervisory Natural Resources Management Service, Rosprirodnadzor, and regional authorities as well as top industry management);
- 2) provide good understanding and the necessary background for the future practical actions in the field of both BAT principles in general and on the new legislation with regards to granting BAT-based Integrated Environmental Permits (IEP) to Category I (similar to IED) industrial enterprises (according to the FZ-219, Russian IED legislation) and providing an insight in how the BAT-thinking can be used on the Barents Hot Spots in order to promote appropriate requirements and actions for the exclusion.

The Introductory Workshop was conducted in Moscow on the 26th September at the premises of the Federal State Autonomous Body Research Institute ‘Environmental Industrial Policy Centre’ (Russian BAT Bureau) with the support of representatives of SHE and Russian authorities (the Ministry of Industry and Trade of the Russian Federation (Minpromtorg), the Ministry of Natural Resources and Environment of the Russian Federation (Minprirody) and in close collaboration with the leading Russian sector and inter-sector experts.

The topics of the SA No 1 a) covered the following themes:

- Key information of the Russian BAT-related legislation (FZ-219 as well as related Government Decrees)
- Key information on Best Available Techniques (BATs), Reference Books on Best Available Techniques (BREFs) most appropriate for the North-West Russia and especially Hot Spot industries
- BAT and BREF (Russian BREFs first of all) connection to the Barents Environmental Hot Spots exclusion procedures
- Principles of Integrated Environmental Permits and requirements of BAT Associated Emission Levels (BAT-AELs)

For more detailed see the Table 1 below.

Table 1 – SA No 1 a) Agenda

Topic and time	Presenter	Comments
9.30	Registration. Coffee Reception.	
10.00	Opening. Dmitry Skobelev, Head of Russian BAT Bureau Ake Mikaelsson, Program Co-ordinator for Russia, Swedish Environmental Protection Agency (SwEPA)	
10.45 Introduction	Alexander Druchinin, Deputy head, International Organizations Division, Department of International Cooperation, Minprirody Ake Mikaelsson, Co-chair of SHE, Swedish Environmental Protection Agency (SwEPA)	On Swedish-Russian collaboration in the field of BAT
11.00 BAT Principles	Tatiana Guseva, ‘Environmental Industrial Policy Centre’ (Russian BAT Bureau) Michael Begak, St. Petersburg Research Centre for Environmental Safety, Russian Academy of Sciences	International and Russian approaches to BAT. BAT as the means of environmental regulation of industrial activities. BAT and resource effective economy
11.20 Hot Spots of the Barents region: urgent environmental enhancement issues	Ruslan Butovsky, Head of BAT Centre, All-Russian Research Institute for Nature Protection	Hot spots: geographical and sectoral contexts. Perspectives for the exclusion of installations from the Hot Spot List.

Topic and time	Presenter	Comments
	Ake Mikaelsson, Co-chair of SHE, Swedish Environmental Protection Agency (SwEPA)	
11.40 Russian BAT/IEP legislation	Victoria Venchikova, Deputy Director, Department for State Policy and Regulation in the Field of Environmental Protection, Minprirody	Russian BAT Law. Legislative acts that need to be passed in the near future.
12.30	Lunch	
13.30 Russian BREFs: development and application	Tatiana Guseva, Environmental Industrial Policy Centre (Russian BAT Bureau) Irina Tikhonova, D. Mendeleev University of Chemical Technology of Russia	Results of the development of the Russian BREFs. Sector-oriented and ‘horizontal’ BREFs. Application principles.
14.00 BATs for Industrial Power Generation and Energy Efficiency	Evgeny Gasho, National Research University ‘Moscow Power Engineering Institute’	Special characteristics of BAT for Large Combustion Plants (LCP)
14.40 BREF1-2015 Production of cellulose, pulp, paper, paper board	Victor Veselov, Russian Pulp and Paper Industry Association ‘RAO Bumprom’	Drawing up BREF 1-2015 and establishing technological parameters for Pulp & Paper Industry
15.20	Coffee Break	
15.50 Current practices of Municipal Waste Water Treatment Stations/Plants (Vodocanals) and principles of the application of the BREF 10-2015 ‘Centralized municipal wastewater treatment’	Dmitry Danilovich, Municipal Waste Water Treatment Association ‘Housing/utilities infrastructure and the Environment’	An overview of current practices and improvement opportunities (based on BREF 10-2015 principles)

Topic and time	Presenter	Comments
16.20 Integrated Environmental Permits and Environmental Performance Enhancement Programmes	Tatiana Guseva, Environmental Industrial Policy Centre (Russian BAT Bureau)	Expected regulations: Integrated Environmental Permits and Environmental Enhancement Programmes. Key procedures. The roles of federal and regional authorities
17.00 Discussion and Conclusion		

Thirty eight (38) participants attended the Introductory Workshop (‘offline’):

- Industries from the North-West Federal District:
 - 8 representatives
- Regional executive authorities (Regional Ministries) and regional (territorial) units of the Federal Supervisory Natural Resources Management Service (Rosprirodnadzor):
 - 11 representatives
- Federal executive authorities (Minprirody) and the Federal Supervisory Natural Resources Management Service:
 - 5 representatives
- Research centres and higher education establishments:
 - 7 representatives
- Environmental consulting companies:
 - 2 representatives
- Industry Associations:
 - 2 representatives
- Barents Euro-Arctic Cooperation:
 - 3 representatives

The list with attendees (with contact details) is provided below in the Attachment 1. It is necessary to mention that some participants who acted as presenters (for example, of the Pulp and Paper BREF peculiarities) or will potentially become trainers at the next workshops appeared to be at the same time trainees (‘Train the Trainers’ principle, who learnt a lot about the new legislation and Hot Spots of the Barents region).

The workshop presentations and hand-outs were prepared on the basis of EIPC/BAT Bureau materials considering recent alterations in the legislation, priority sectors and inter-sector issues (Pulp and Paper, Municipal Wastewater Treatment, Energy Generation and Energy Efficiency, and Environmental Self-Monitoring).

Hot Spots related presentations were prepared in accordance with SHE recommendations.

The workshop was broadcasted on YouTube to open opportunities of wider regional stakeholders to participate in this event, up to 14 participants join the stream on 26th September.

Hand-outs and were uploaded at: <https://mega.nz/#F!ZIZ1SCzD>
(Password: !P04pd_mbEpkXzTmzLochyw) and offered also on USB-disks.

Video materials (in Russian) are also available by this link. In order to gain access to the data storage the user should paste/type the Password into the field «Ключ дешифрования» and click the «Дешифровать» button.

The information will be available for free download for 3 months, starting on the 10th of October 2018.

Lessons Learnt

- In the Barents region, there is a strong interest to understand
 - 1) details of BREFs/BAT/BAT-AELs;
 - 2) interrelatedness of BREFs/BAT-AELs and Integrated Environmental Permits
 - 3) peculiarities of BREFs/BAT-AELs for priority industrial sectors of the Barents region;
 - 4) opportunities for developing Environmental Performance Enhancement Programmes (EPEPs) and implementing them for obtaining IEPs and for the exclusion from the Hot Spots list
- Several industries and regional authorities expressed their interest in receiving additional information on the **Environmental Performance Enhancement Programmes** of the industries not fully compliant with sectoral BATs and opportunities to apply to the Ministry for Industry and Trade for the financial support of the environmental modernisation by Minpromtorg
 - There is a strong interest in learning more about the procedure of the assessment of draft EPEPs at the **Interdepartmental Commission** (co-ordinated by the Russian BAT Bureau)
- There is a **correlation between Russian ‘Hot Spot’ sites and so-called Three Hundred Pilot Category I (IPPC) Installations** chosen by Minprirody to be the first to apply for Integrated Environmental Permits under BAT legislation (see Fig. 1 for Pulp and Paper Industries)
- Environmental Ministries of five Russian Barents region Federation subjects submitted letters describing their priorities dealing with Hot Spot exclusion process and connected also with the new BAT/IED legislation. There is a definite match between these regional ‘Wish Lists’, the Hot Spots List and the List of Three Hundred Pilot Category I (IPPC) Installations
 - **It is reasonable running the first Interactive Workshop in Syktyvkar and focusing it on (1) Pulp and Paper and (2) Large Combustion Plants BREFs/BATs/EPEPs.**
- Target group members realise that not all legislative acts, norms and standards needed to begin granting Integrated Environmental Issues have been passed, and even if passed than not fully understood, and emphasise that the first operators applying for the EIPs will undeniably face serious difficulties. Thus, all stakeholders need support and training, and mixed group training will likely help to harmonise positions of regulators, supervisory bodies and operators.
- Representatives of regional authorities, territorial Rosprirodnadzor units, industries, consultants, and other stakeholders are eager to discuss their points concerning

IEPs/BREFs/BAT-AELs with each other and with BAT experts and look forward to getting a platform for the open discussion(s)

- Four Barents region Federation subjects of five have installations included in so the List of 300 installations that must obtain Integrated Environmental Permits in 2019-2022 (being therefore pilot industries for the Russian system of granting such permits) (i.e, see Table 2). Six Hot Spots appear in the list though their descriptions are a bit different due to the peculiarities of the registration of Category I installations in Russia.

Table 2 (excerpt) – Russian Hot Spots and 300 Pilot Category Installations (from the List of 300 Installations)

300 Pilot Category I Installations	Russian Hot Spots
Murmansk region	
AO Kovdor mining and processing integrated plant	M5 – Kovdor mining and processing integrated plant, Eurochem
AO Kolskaya MMC, Nickel	M1- Pechenganickel, Kolskaya MMC, Nickel
AO Kolskaya MMC, Monchegorsk	M2 – Mochevorsk industrial site AO Kolskaya MMC
Arkhangelsk region	
AO ‘Arkhangelsk Pulp and Paper Plant’	A4 – Arkhangelsk Pulp and Paper Plant
AO ‘Ilim Group’, PPP	A5 – Division of Ilim Group in Koryazma
Komi Republic	
AO ‘Vorkuta coal’, ‘Vorkutinskaya’ mine	Ko-1- coal mines of AO ‘Vorkuta coal’, Vorkuta
AO ‘Vorkuta coal, ‘Pechorskaya’ mine	
AO Vorkuta coal’, ‘Zapolyarnaya’ mine	
AO ‘Vorkuta coal’, ‘Komsomolskaya’ mine	
AO ‘Vorkuta coal’, ‘Vorshagorskaya’ mine	
AO ‘Vorkuta coal’, ‘Severnaya’ mine	

Locations of the Large Pulp and Paper Mills included in the List of 300 Installations are shown on Fig. 1 below. The bulk of Category I enterprises included in the List of 300 Installations are situated within the boundaries of North-Western Federal District, namely, in the Barents region.

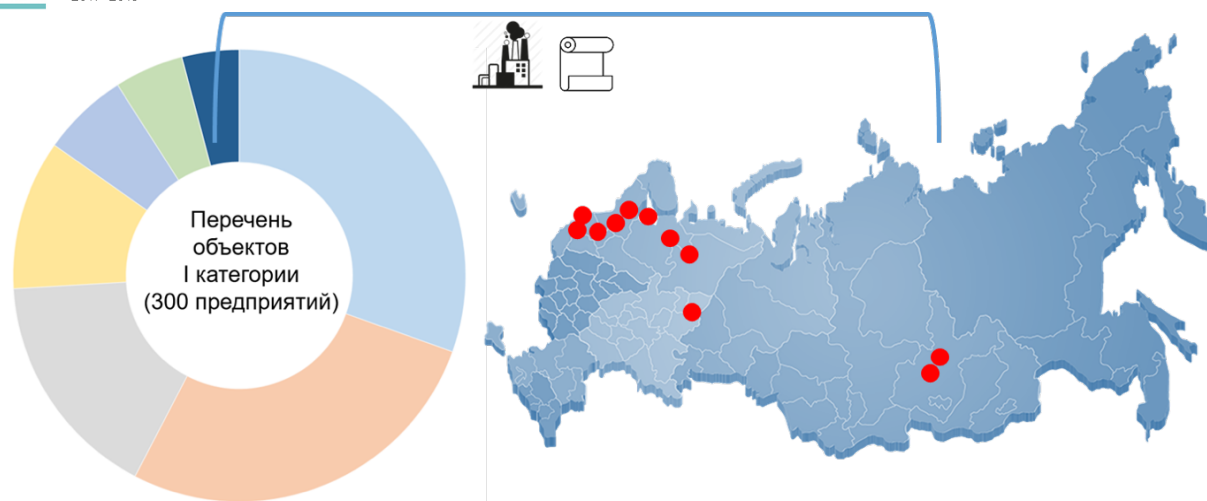


Fig. 1 Pulp and Paper Mill included the List of 300 Installations

The organisers would like to mention a substantial role of the Centre for Clean Production and Sustainable Development (<http://ruscp.ru/>) and its Director, Mr. Yan Tsygankov in preparing for and carrying out of the Introductory Workshop.

It is also worth mentioning the challenges encountered during the preparation of event: it was quite difficult to assemble the group due to incomprehensive/non-updated info on potential participants to the workshop. Using the qualitative approach, it is reasonable to say that the process of finding and persuading the potential participants took nearly a half of efforts spent on preparing the workshop.

Conclusion (Recommendations)

Based on lessons learnt by preparing and running the Introductory Workshop 1a it is recommended:

- To perform in-depth BAT/BREF/IEP workshops (Interactive Workshops) for the practitioners of each region taking into the account the specific industrial sites subject to Hot Spot/BAT requirements as well as to BAT/IED requirements.
 - These workshops are essential since the participants need to be not just introduced but fundamentally prepared to using BREFS, BAT-AELs (officially issued BAT-associated Emission Limit Values, similar to BAT Conclusions) and develop EPEPs (Environmental Performance Enhancement Programmes).
- To invite regional practitioners nominated by the attendees of the Introductory Workshop to participate in the Interactive Workshops, taking also into account contacts with regional stakeholders kept by SHE Group as well as by the Russian BAT Bureau.
 - To try and run the first Interactive Workshop in Syktyvkar and focusing it on (1) Pulp and Paper and (2) Large Combustion Plants BREFs/BATs/EPEPs in November 2018
- To motivate the regional participants to prepare ‘homework’ based on short analytical papers that include assessments of their industries, objectives of Rosprirodnadzor related to BAT/IEP, etc.
- To cover the following groups of attendees to take part in the Interactive Workshops:

- Industry practitioners (technologists, environmental managers, etc.) of sites included in the list of Hot Spots and in the list of 300 Pilot Category I Installations
- Officers (inspectors) of territorial (regional, republic, etc.) units of Rosprirodnadzor
- Officers of regional Environmental Ministries and Departments
- Representatives of regional technical universities and consulting companies who (potentially) can be nominated as BAT experts to participate in the procedures of granting Integrated Environmental Permits and approving Environmental Performance Enhancement Programmes.

From the organisational point of view, it is recommended to discuss opportunities to compile draft lists of attendees of the Intensive Workshops as soon as possible mobilising existing contacts of SHE group, managers of industrial enterprises and environmental authorities of all levels.

Attachment 1

List of Participants (and Trainers) of the Introductory Workshop (available in Russian with greater details)

№	Name	Position	Organization	E-mail
1	Abramova, Vera	Department for regulating and permitting activities	Federal Supervisory Natural Resources Management Service (Rosprirodnadzor)	olga.kharkovskaya@rpn.gov.ru
2	Balakhonov, Igor	Environmental Department	RUSAL (aluminium), responsible for the Nadvoitsky Aluminium Plant)	Igor.Balakhonov@rusal.com
3	Barsukov, Dmitry	Director for occupational and technical safety and environment	Segezha Pulp and Paper Plant (Rep. Karelia)	barsukov_dn@segezha-group.com
4	Begak, Mikhail	Head scientist researcher	St. Petersburg Research Centre for Environmental Safety, Russian Academy of Sciences	mbegak@gmail.com
5	Bobina, Yulia	Climate, Environment and Hot Spots Adviser	International Barents Secretariat	julia@barentscooperation.org
6	Butovsky, Ruslan	Head of BAT Centre, Member of SHE Group	All-Russian Research Institute for Nature Protection	rbutovsky@rambler.ru
7	Chechevatova, Olga	Deputy Director	EIPC (Russian BAT Bureau)	sekr@eipc.center
8	Danilovich, Dmitry	Center for technical policy and modernisation	Municipal Waste Water Treatment Association 'Housing/utilities infrastructure and the Environment'	da_danilovich@mail.ru
9	Druchinin, Alexander	International Organizations Division, Department of	Minprirody	Druchinin@mnr.gov.ru

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		International Cooperation		
10	Ermilov, Sergey	Deputy Head	Rosprirodnadzor (Rep. Komi)	T215937@mail.ru
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12	Gasho, Evgeny	Energy Efficiency Laboratory	National Research University 'Moscow Power Engineering Institute'	290461@bk.ru
13	Golubeva, Svetlana	Directot	Consulting Company 'Agency for Integrated Development'	sgolubeva@asr-net.ru
14	Grevtsov, Oleg	Head of Division for BAT Implementation	EIPC (Russian BAT Bureau)	o.grevcov@eipc.center
15	Gun'kina, Natalia	Department for State Environmental Expert Review and regulation activities	Rosprirodnadzor (Arkhangelsk Region)	Nat.gun@yandex.ru
16	Guseva, Tatiana	Deputy Director	EIPC (Russian BAT Bureau)	tatiana.v.guseva@gmail.com
17	Ivanova, Ekaterina	-	Consulting company 'Garantia'	ecoecspert@yandex.ru
18	Kadyrov, Oleg	Department for Occupational Health, Safety and Environment	Eurochem (fertilizers), responsible for Kovdorsky GOK	Oleg.Kadyrov@eurochem.ru
19	Karavaev, Dmitry	Deputy Head of Env. Protection	Mondi Syktyvkar (Rep. Komi), Pulp and Paper Mill	Dmitry.karavaev@mondigroup.com
20	Kharkovskaya, Olga	Department for control, coordination, regulation and permitting activities in the area of air protection	Rosprirodnadzor	olga.kharkovskaya@rpn.gov.ru

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21	Kochnov, Mikhail	Department for regulating and permitting activities	Federal Supervisory Natural Resources Management Service (Rosprirodnadzor)	olga.kharkovskaya@rpn.gov.ru
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24	Lazarev, Alexander	Department for Fees and Permitting Activities	Rosprirodnadzor North-West Federal District	Rpn78@rpn.gov.ru lazarev.aleks@gmail.com
25	Mikaelsson, Ake	Co-chair of SHE	SwEPA	Ake.Mikaelsson@naturvardsverket.se
26	Molchanova, Yana	Associate Professor	D. Mendeleev University of Chemical Technology of Russia	yanamolchanova@gmail.com
27	Moskalyuk, Evgenia	Chief Environmentalist	Arkhangelsk Pulp and Paper Mill	Moskalyuk.evgenia@appm.ru
28	Natjehall, Richard	Expert	SwEPA	Rickard.Natjehall@naturvardsverket.se
29	Novozhilova, Elena	Department for State Policy and Regulation in the Area of Env. Protection	Minpriroda (Murmansk Region)	enovozhilova@gov-murman.ru
30	Podol'skaya, Oksana	Head	Rosprirodnadzor (Murmansk Region)	rpn51@rpn.gov.ru
31	Ponomar'ov, Konstantinu	-	Rosprirodnadzor (Nenets Autonomous Okrug)	Rpn83@rpn.gov.ru
32	Popov, Alexander	Researcher	EIPC (Russian BAT Bureau)	a.popov@eipc.center

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33	Popov, Ivan	Department for Natural Resources and Environment	Ministry for Natural Resources and Timber Processing Complex (Arkhangelsk Region)	popovin@dvinaland.ru ivanecolog@yandex.ru
34	Sanzharovskiy, Alexander	Researcher	EIPC (Russian BAT Bureau)	a.sanzharovskiy@eipc.center
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37	Shabanova, Svetlana	Department for methodological support	Federal Centre for Analysis and Assessment of the Environmental Impact (Rosprirodnadzor)	shabanova.svetlana@fcao.ru
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40	Suvorova, Oksana	Department for water resource control and marine control	Rosprirodnadzor	olga.kharkovskaya@rpn.gov.ru
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42	Tchizhikov, Ilya	Department for Environment and Licensing	Petrozavodsk Municipal Waste Water Treatment Plant (Rep. Karelia)	i.chizhikov@rks.karelia.ru
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47	Zaverach, Irina	Department for Norms, Permits, Environmental Expertise and Pollution Charges, Deputy Head	Rosprirodnadzor (Rep. Karelia)	rpn10@rpn.gov.ru ; urpn10itb@mail.ru