

The European Union's Instrument for Pre-Accession Assistance (IPA)

Working Group 4 – ECENA - Activity Scheme 4.1

Capacity building regarding compliance with environmental legislation through better understanding of issues and identification of targeted solutions (training of inspectors and permit writers)

TRAINING EVALUATION

country: ALBANIA

dates: 1 – 4 March 2011

Prepared by Rob Glaser and Ike van der Putte

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Human Dynamics KG

- **RENA Working Group 4 – ECENA - Activity 4.1 - ALBANIA**

Capacity building regarding compliance with environmental legislation through better understanding of issues and identification of targeted solutions (training of inspectors and permit writers)

1. Introduction

A first training course was given in Albania in the Tirana International Hotel, Tirana from 1 – 4 March 2011. The total number of participants was 21 (mostly inspectors), including two inspectors from Macedonia and two inspectors from Croatia. The Antea Cement factory at Kruja (30 kilometres from Tirana, www.anteacement.com) served as the site where a site visit and a “common inspection” were held. The training was given by Rob Glaser and Ike van der Putte.

2. Background

Within the defined RENA WG 4 – ECENA programme a series of national training programmes in eight RENA beneficiary countries are to be held. The basic elements are in brief:

Implementation of 3.5 days training workshop on permitting and inspection in each individual country for 20 participants (10 permit writers max and 10 inspectors max), or depending on the country on any other identified weakness in the regulatory cycle element (20 participants max.).

A site visit with around 2 invited participants (inspectors) from other RENA countries, is included (common inspection) in order to promote the exchange of experience within the region. However, if the expertise for a defined topics is not available within the RENA countries, the inspectors from other MS will be invited.

The priorities indicated in the inception mission reports and filled in questionnaires for each country are used as a basis for composing the national trainings aiming at a tailor made approach to the trainings. The selected topics and preliminary programmes for the first batch of four countries (Albania, Kosovo, Bosnia and Herzegovina, and Turkey) have been assessed (see separate report).

The topics to be covered in the 3.5 day training programme will be generally composed of:

Day 1: General subjects (management of inspections, priority setting, reporting feedback, exercises, introduction to special subjects)

Day 2: IPPC/IED requirements

- Discussion on integrated permit content (permit application, BREFs/BATs selected industry); on content of translated permit for the selected pilot.
- Presentation of selected pilot factory specialist
- Experience from other countries inspectors (preferred regional)
- Site visit preparation

Day 3: Site visit and reporting

Day 4: Presentation of results and special subjects.

The special subjects and specific directives and regulations to be selected might include IED/IPPC with EIA, LCP, PRTR, RMCEI, SEVESO II, VOCs, Waste and Chemicals management and Environmental Crime

The selection of Inspectors that join the training from other countries (Common Inspection) will have to meet the following criteria:

- Must have experience in inspecting a similar facility in their own country
- Must be able to present their inspection and enforcement system applied

- Must be capable to present how reporting, feedback and follow up of their enforcement activities are organised.

Delegates

The participants in the training in Albania were 17 persons from the Ministry of Environment, Forests and Water Administration, Regional Agencies and inspectorates and the Durres Municipality. Croatia and Macedonia have each sent two inspectors respectively to be involved in the “common inspections” and presentations:

- | | |
|-------------------|--|
| 1. Enis Tela | EI, Coordinator of WG 4 in Albania. |
| 2. Enver Alipaj | Environmental Inspector at the Ministry. |
| 3. Blerim Gjyzeli | Specialist at Durresi Environmental Regional Agency. |
| 4. Gjin Shkëmbi | Environmental inspector at Durrësi Unit of Inspectorate. |
| 5. Nehat Daci | Environmental inspector at Durrësi Unit of Inspectorate. |
| 6. Gani Deliu | Specialist at Tirana Environmental Regional Agency. |
| 7. Dritan Seferaj | Environmental inspector at Tirana Unit of Inspectorate. |
| 8. Edmond Ndreu | Chief of Environmental Regional Agency of Lezha Prefecture. |
| 9. Dritan Dhora | Specialist at Shkodra Environmental Regional Agency. |
| 10. Adi Madhi | Chief of Environmental Regional Agency of Elbasan Prefecture |
| 11. Beqir Kila | Specialist at Elbasan Environmental Regional Agency. |
| 12. Anila Kala | Chief of Environmental Regional Agency of Berat Prefecture. |
| 13. Avni Hida | Specialist at Fieri Environmental Regional Agency. |
| 14. Oltion Bejaj | Specialist at Vlora Environmental Regional Agency. |
| 15. Ionida Leshi | Inspector Regional Agency of Berat |
| 16. Eljan Kasa | Specialist at Durresi Environmental Regional Agency |
| 17. Abog | Specialist at Durresi Municipality |

Inspectors from Macedonia:

Ivan Kamenjarski

Mite Nacev

Inspectors from Croatia:

Vlastica Pasalic

Brigitte Cecatka

Trainers

Rob Glaser

Ike van der Putte

Training Materials

All delegates were provided with printed copies of the manual and presentation materials.

Simultaneous translation was provided throughout the workshop with presentations given in both English and Albanian.

As special subjects Albania has chosen IPPC/IED and SEVESOII, with the ANTEA cement factory as the pilot site for site visit and common inspection.

The training materials included those in the manual developed in specific for Albania in which also the selected special subjects were taken up. Example IPPC permits for the cement industry, with BAT and BREF information materials were incorporated. In the manual also extra materials were included covering other items which have not specially been selected by Albania, but which are of general relevance for the ECENA countries.

Course Content

The agenda, containing a summary of the content of the training and presentations, is given in Annex.1 Introductions and explanations were given on the regulatory cycle with the human resources aspects in permitting and inspection. Special attention was given to the IED and consequences for the inspection and enforcement.

About 40% of the course was devoted to the site visit, group discussion and feedback and to practical exercises with the delegates divided into three working groups dealing in specific with the following units in the cement factory operations:

- 1) Quarry operation and rehabilitation
- 2) Main process units and dust abatement
- 3) Laboratory and control room with emphasis on continuous monitoring (SO_x, NO_x, dust)

The site visit was executed according to a checklist prepared by the participants.

The ANTEA Cement Sh.A. is one of the largest industrial Greenfield investments by the TITAN GROUP, in Albania. The new cement plant near Kruja, is capable of producing a total of 1.5 million tons of cement per year. A summary of the permit conditions for ANTEA cement was provided and discussed against the BAT/BREF requirements.

In the course presentations were given by the invited inspectors from Macedonia and Croatia, to share their experiences in IPPC permitting and enforcement with special reference to the cement industry.

These materials are included in Annex 2.

Feedback and Response

The course was lively with questions and discussions between the delegates as well as with the trainers throughout the three and a half days.

Formal feedback forms were distributed at the end of the course, and are analyzed below. 17 responses were received. The questions refer to

1. expectations of the participants
2. the training and presentations
3. comments and suggestions

The results are given in summary tables Annex 3.

The expectations were generally and in specific met (15 respondents), whereas two respondents answered that expectations were partially met. In the latter cases more information on permitting and IED would have been helpful, and more information on inspection respectively.

The training and presentations were various ways considered as excellent to good (16 out of 17 respondents). The quality of the training materials, the practical work and the quality of the trainers (knowledge and preparation) were especially highly rated, next to the logistical arrangements.

On comments and suggestions the following can be mentioned:

From 7 participants a recommendation was received to translate the manual into the Albanian language;
More inspectors and permit writers have to be invited from REA's (1 participant);
More attention to the use of monitoring equipment during the site visit (1 participant);
Preference for a per diem instead of fixed meals at the hotel (1 participant).

Conclusions

The first training course was well received. The contributions of the inspectors from Macedonia and of Croatia were excellent and especially contributed to the understanding of the permits and permitting in their respective countries. Presentations were well prepared. The site visit was well received and a good exchange of views took place onsite of the factory with the management and operators. Permit conditions were surveyed and comments from the inspectors were discussed with the management of the factory. The materials provided, were very well compiled and printed. There was a strong wish to have all materials translated into Albanian.

ANNEX 1. Training programme Albania

ANNEX 2. Presentation materials of Invited Inspectors and Summary Factory permit

ANNEX 3. Summary course evaluation form

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March 1 – 4, 2011

DAY 1

08.00-08.45 Registration
08.45 Opening

Session 01 09.00- 09.20 (20 minutes)

Introduction

(explanation of the training programme, information on RENA, ECENA and the project activity: Introduction of participants) (IP/GI)

Session 02 09.20 -09.40 (20 minutes)

Regulatory cycle

(the role and functioning of the regulatory cycle; consequences for the organisation of the process of environmental policy-making and strategy with its implementation; systematic approach; feedback asked from participants and explanations of what is presented; how are they going to use this in practice during their training) (short discussion on regulatory cycle) (RGI)

Session 03 09.40 -10.00 (20 minutes)

Minimum criteria for inspection

(Scope, definitions, Inspection, Inspectorate, Inspectors, why to inspect routine and non-routine inspections, frequency of inspection setting priorities new trends in permitting and compliance, RMCEI) etc.) (RGI/IP)

10.00 – 10.15 Coffee Break (15 minutes)

Session 04 10.15 -`11.15 (60 minutes)

Planning use of human resources capacity scheme (exercise)

(human resources calculation scheme) (RG)

- Session 05** **11.15 – 12.30** **(75 minutes)**
Basics of Integrated Permitting and its Application
(background information on IPPC and related permitting and application aspects) (RG/IP)
- 12.30 13.30** **Lunch break** **(60 minutes)**
- Session 06** **13.30 - 14.15** **(45 minutes)**
On site inspection and planning
(which ways to inspect; announced/unannounced; desk/versus -on site; preparation of site visit; identification of roles; use of checklists; example of checklist for a virtual site to be visited)
- Session 07** **14.15 – 15.00** **(45 minutes)**
Monitoring/Self monitoring
(quality assurance management; impact of self monitoring on inspections, LCP monitoring.)
- 15.00- 15.15 Coffee Break (15 minutes)**
- Session 08** **15.15 - 15.45** **(30 minutes)**
General analysis of the inspection results (evaluation of results and feedback)
(Covering evaluation. Feedback and three types of reporting: individual inspection report, annual summary report for the site and country report. Should cover, prompt reporting, better comment and analysis after the inspection.)
- Session 09** **15.45 - 16.30** **(75 minutes)**
Special Subject: SEVESO II intro (IP)
- 17.00 Closing Session**

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DAY 2

- Session 10** **08.45 -09.30** **(45 minutes)**
IED in context with IPPC and other directives
*(General information on developments and current situation of the
environmental legislation with consequences for enforcement mechanisms in
EU)(IP)*
- Session 11** **09.30 – 11.00** **(90 minutes)**
Permit applications
*(Contents of a permit application in detail in general, cement industry as an
example Explanation of the cement process applied in
Albania)(REPRESENTATIVE OF FACTORY and RGL)*
- 10.30 Coffee Provided**
- Session 12** **11.00 –12.30** **(90 minutes)**
Integrated permit of factory to be visited
*(The translation of the permit conditions of the prevailing permit and
comments of invited inspectors as well as local country inspector in charge of
inspection, discussion on enforceability of permit conditions)(REPR OF
FACTORY, inv INSP and RGL)*
- 12.30– 13.30 Lunch Break (60 minutes)**
- Session 13** **13.30 -14.10** **(40 minutes)**
Introduction to BREF and BAT of the cement industry
*(Comparison of prevailing emission and monitoring data with the information
from the BREF/BAT) (Inv INSPECTORS, REPR FACTORY, RGL)*
- Session 14** **14.10 - 15.00** **(50 minutes)**
Basic approach to site visits
*(overview of methods and questioning during investigations and inspection
Exercise:)(RGL/IP)*
- 15.00 Coffee Break (15 minutes)**

Session 15 **15.15 – 16.15** **(60 minutes)**
Planning of visits in groups with specific assignments . preparation for next day inspection visit
(Study in groups on the specific assignments setting up a questionnaire with questions and attention points during the site visit (IP)

Session 16 **16.15- 16.45** **(30 minutes)**
(Invited Inspectors presenting experiences in their country)
(Inv INSPECTORS)

16:45 Closing Session (IP)

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DAY 3

09.00 Departure to CEMENT FACTORY

Execution of site visit according to prepared plan of action.

At the site.

Preliminary discussions in the office

Review documentation (monitoring data, quality checks, site plans, permits)
is necessary documentation in place?

Comments and questions

Divide into groups with chairman and reporter in each. Chairman has allocated specific responsibilities to each member of the group

Site visit:

Request site staff to provide guides: groups to see all of the site, but focus on areas: like handling and storage, dust abatement, waste handling and filling stations, cleanliness of factory, evaluate surrounding area.

Each member of the group will make their own inspection and make notes and compare results later in the group.

Return to Meeting room at the factory.

General comments on visit site and any further questions

15.00 Return to meeting room in the hotel

Session 17 16.15- 16.45 (30 minutes)
Visit report preparation in groups

Session 18 16.45 – 17.30 (45 minutes)
Presentation of reports by members of the groups
*(Comments by inv Inspectors. Conclusion of site visit
Suggested follow-up actions.)*

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DAY 4

Session 19 08.45 – 10.15 (90 minutes)

**Special subjects
Follow-up of session 8**

10.15 Coffee Break (15 minutes)

Session 20 10.30 11.45 (85-90 minutes)

Cooperation between authorities

12.00 Closing session and evaluation forms

12.30 Lunch Break

Delegates leave after lunch



REPUBLIKA E SHQIPËRISË
MINISTRIA E MJEDISIT PYJEVE DHE ADMINISTRIMIT TË UJËRAVE
DREJTORIA E KONTROLLITË MJEDISIT
INSPEKTORIATI I MJEDISIT

Adresa: “ Rruga e Durrësit ” Nr. 27, Tiranë, Tel: 2270630, Fax: 2270627; www.moe.gov.al

Matter: **Environmental Permits of the activities of “ Antea Cement ” Anonymous Corporation, part of “ TITAN “ Group.**

1. Decision Nr. 3 of Permit’s Commission, protocol no. 233, dated 21.03.2008 for activities that have impact on environment.

Type of the activity: Construction of automotive road that tied the factory at the Thumana Commune, Kruja region, with the national road Tirana - Shkodra.
Lengthwise of the road: 5,7 Km
Wideness: 12 m.

2. Decision Nr. 16 of Permit’s Commission, protocol no. 3418/E, dated 01.07.2010 for activities that have impact on environment.

Type of the activity: **Argil/Clay Quarry**
Located on Picroge village, Thumana Commune, region of Kruja.
Total surface: 58,95 Hectare.
Obligation: Re establish of the exploited surface of the quarry (Regulation of the soil and mineral waste and planting).
Geographical coordinates:

	Y (EAST)	X (NORTH)
Point no. 1	43960527710	46026026200
Point no. 2	43965213780	46031179410
Point no. 3	43971573440	46026383130
Point no. 4	43966195620	46020538370

3. Decision Nr. 11 of Permit’s Commission, protocol no. 566, dated July 2008 for activities that have impact on environment.

Type of the activity: **Gypsum Quarry**

Located near Manskuri village, Rrashbull Commune, region of Durrës.

Total surface: 531.435 m².

Capacity: 85.000 - 90.000 ton per year.

Obligation: Re establish of the exploited surface of the quarry (Regulation of the soil and mineral waste and planting)

Geographical coordinates of the object/ working yard:

No.	X	Y
Point no. 1	45 72 783	43 78 504
Point no. 2	45 72 783	43 78 942
Point no. 3	45 71 687	43 78 961
Point no. 4	45 71 691	43 78 522
Point no. 5	45 71 850	43 78 475
Point no. 6	45 72 333	43 78 420

4. Decision Nr. 16 of Permit's Commission, protocol no. 3418/4, dated 1.07.2010 for activities that have impact on environment.

Type of the activity: **Limestone Quarry**

Located at Picroge village, Thumana Commune, region of Kruja.

Total surface: 106,90 Hectare

Capacity: 85.000 - 90.000 ton per year.

Obligation: Re establish of the exploited surface of the quarry (Regulation of the soil and mineral waste and planting)

Geographical coordinates of the object/ working yard:

	Y (EAST)	X (NORTH)
Point no. 1	43938634820	46026879150
Point no. 2	43938698120	46028578360
Point no. 3	43944033310	46031377070
Point no. 4	43947165770	46024113740
Point no. 5	43947932290	46024113740
Point no. 6	43950731460	46024113740
Point no. 7	43944778470	46014496500
Point no. 8	43941553110	46021048080

5. Decision Nr. 16 of Permit's Commission, protocol no. 3418/5, dated 1.07.2010 for activities that have impact on environment.

Type of the activity: “ **Cement Production** ”

Located at the south of Zgërdheshi village, Borizanë, region of Kruja.

Total surface: 78 Hectare

Capacity: 3500 ton per day.

Referring to the Decision no. 435, dated 12.09.2002, “ On the approval of norms of discharge ” of Council of Ministers during the production phase:

Elements	LN	SO ₂	NO ₂
Mensuration Unit	Mg/m³		
Limited value	50	400	800
Limited value	50	400	800
EU norms:	30	400	600
Self monitoring results			

Referring to the Decision no. 177, dated 12.09.2002, “ For allowed norms of liquid releases and the zoning criteria of receiving water environments ” of Council of Ministers during the production phase:

Parameters	Concentration
NBO-5 at 20° without nitrification Biological demand for oxygen	25 mg/l O ₂
NKO (Chemical demand for Oxygen)	125 mg/l O ₂
Total material in suspension	60 mg/l

Permit's obligation:

Self -Monitoring including noise level	Continuously
Reporting to REA-s	Each 3 months.



POST-TRAINING EVALUATION

FULL TITLE OF THE TRAINING: RENA WG4 ECENA Activity 4.1 Capacity building regarding compliance with environmental legislation through better understanding of issues and identification of targeted solutions (training of inspectors and permit writers

LOCATION OF THE TRAINING: Tirana, Albania

DATES: 1 – 4 March 2011.

1. Statistical Information

1.1	Training Session	Albania
1.2	Trainer Name	Ike van der Putte/ Rob Glaser
1.3	Name and Surname of Participant (evaluator)	See participants list

2. Your Expectations (17 respondents)

Please indicate to what extent specific expectations were met, or not met:

My Expectations	My expectations were met		
	Fully	Partially	Not at all
1 several (IED, inspection, permitting), general and specific	15	2	
2			
3			

3. Training and Presentation

Please rate the following statements in respect of this training module:

Aspect of Training	Excellent	Good	Average	Acceptable	Poor	Unacceptable
1 The training achieved the objectives set	9	6				
2 The quality of the training material given to me was of a high standard	12	5				
3 The content of the training course was well suited to my level of understanding and experience	10	6	1			
4 The practical work was relevant and informative	14	2	1			
5 The training was interactive	12	5				
6. The mix between theory and practise allowed sufficient opportunity to implement	10	6	1			



acquired knowledge and skills						
Aspect of Training	Excellent	Good	Average	Acceptable	Poor	Unacceptable
7 Trainer was well prepared and knowledgeable on the subject matter	15	2				
8 The duration of this training course was neither too long nor too short	3	14				
9 The logistical arrangements (venue, refreshments, equipment) were satisfactory	12	5				
10 Attending this training course was time well spent	12	5				

4. Comments and suggestions

I have the following comment and/or suggestions in addition to questions already answered:

Training Session: very interactive

Trainer: very well

Training level and content: -

Other:

1) From 7 participants a recommendation was received to translate the manual into the Albanian language

2) More inspectors and permit writers have to be invited from REA's (1 participant)

3) More attention to the use of monitoring equipment during the site visit (1 participant)

4) Preference for a per diem instead of fixed meals at the hotel (1 participant)