

RESEARCH ON THE PROCESS OF ISSUING B-INTEGRATED ENVIRONMENTAL PERMITS



RESEARCH ON THE PROCESS OF ISSUING B-INTEGRATED ENVIRONMENTAL PERMITS

Electronic edition:

(RESEARCH ON THE PROCESS OF ISSUING B-INTEGRATED ENVIRONMENTAL PERMITS)

Original title of the publication:

ИСТРАЖУВАЊЕ ЗА ПРОЦЕСОТ НА ДОДЕЛУВАЊЕ Б-ИНТЕГРИРАНИ ЕКОЛОШКИ ДОЗВОЛИ

Publisher:

Center for Civil Communications

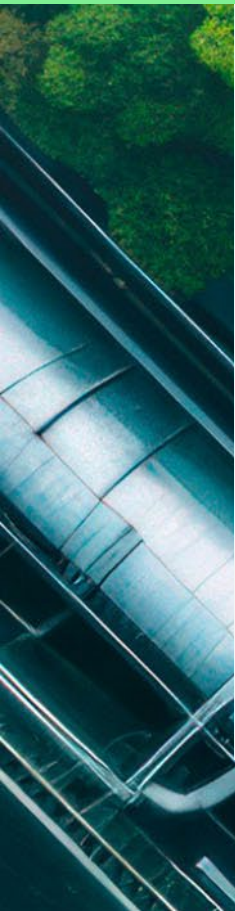
Translation from Macedonian to English:

Magdalena Simionska

Graphic design:

Relativ

Skopje, July 2024



CIP - Каталогизација во публикација Национална и универзитетска библиотека "Св. Климент Охридски", Скопје
352.077.3:502.17]:66/67(497.7)(047.31)

ЦЕНТАР за граѓански комуникации

Истражување за процесот на доделување б-интегрирани еколошки дозволи [Електронско издание] = Research on the process of issuing b-integrated environmental permits = Hulumtim në procesin e dhënies së lejeve të integruara ekologjike b / Центар за граѓански комуникации ; translation from macedonian to english Magdalena Simionska ; përkthet nga gjuhë maqedonase në gjuhën shqipe Agon Ismaili. - Текст во ПДФ формат, содрж. 20, 20, 20 стр., фотографии. - Скопје : Центар за граѓански комуникации ; Skopje : Center for Civil Communications ; Shkup: Qendra për Komunikime Qytetare, 2024

Начин на пристапување (URL): <https://ccc.org.mk/images/eko.pdf>. - Наслов преземен од екран. - Опис на изворот на ден 10.07.2024 год. - Напоребен текст на мак., алб. и англ. Јазик

ISBN 978-608-4974-36-9

а) Б-интегрирани еколошки дозволи -- Издавање -- Индустриски капацитети
-- Локална самоуправа -- Македонија -- Истражувања

COBISS.MK-ID 64058373



Kingdom of the Netherlands

The research has been prepared as part of the project "Safeguards against Corruption" with the financial aid of the Embassy of the Kingdom of the Netherlands in Skopje and is implemented by the Center for Civil Communications from November 1, 2021 to October 31, 2024.



CONTENT

4 / KEY FINDINGS

6 / GOAL OF THE RESEARCH

8 / RESEARCH ON THE PROCESS
OF ISSUING B-INTEGRATED
ENVIRONMENTAL PERMITS

19 / RECOMMENDATIONS

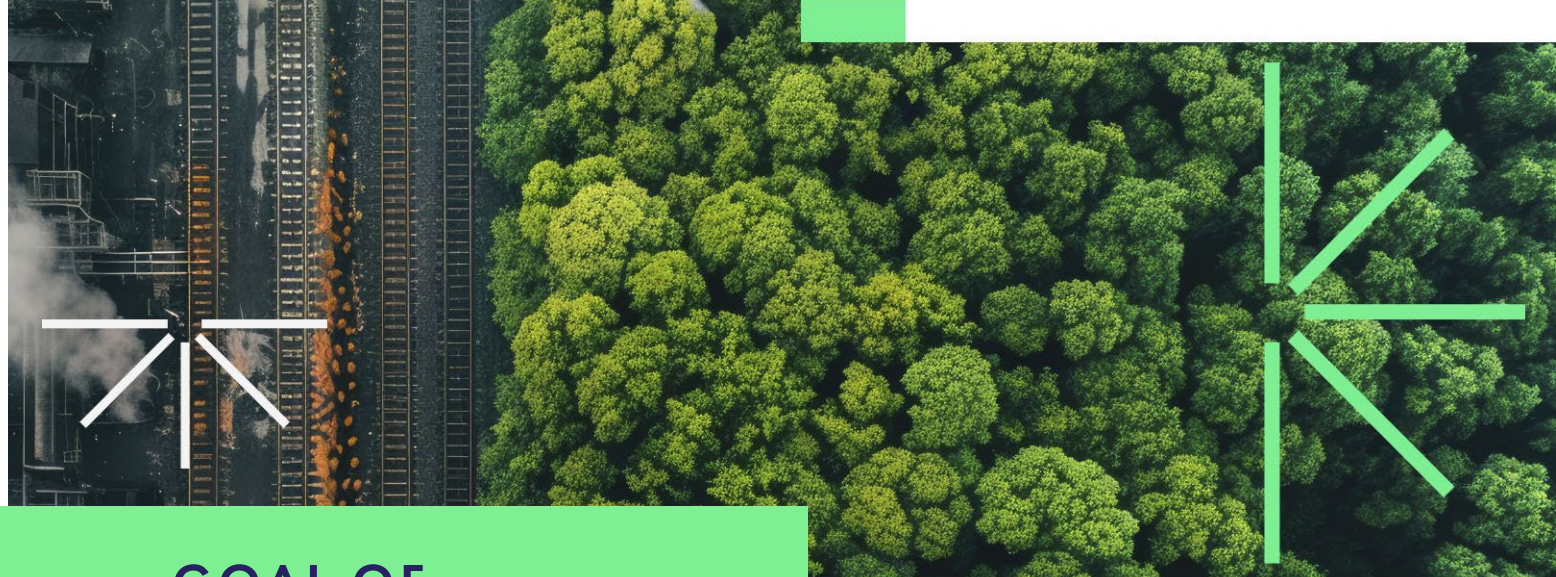


KEY FINDINGS

- **No one in the country has precise data on the number of B-integrated environmental permits issued by the municipalities to companies whose operations affect the environment.** According to the Registry of the Ministry of Environment and Physical Planning (MESPP), there are 278 holders of B-integrated environmental permits. Still, the research has shown that some of the permits issued by the municipalities are not published in the Registry, whereas some of the companies that hold such permits are still in the Registry even though they have closed the installations.
- **No one can answer which companies should hold B-integrated environmental permits.** The country does not have an integrated system, or a control mechanism which will include all industrial capacities whose operations emit harmful substances in the environment. The municipalities have no registers of polluters. Some of them have prepared a so-called cadaster of polluters but only of industries and not individual companies.
- **Although the companies which are holders of B-integrated environmental permits should pay fees on several grounds, not even the big municipalities collect more than a few thousand denars annually from this.** This creates suspicion that the municipalities do not charge the fees for holding B-integrated environmental permits to all permit holders. Also, it can be noticed that some of the companies do not regularly pay even these low fees.
- **The annual fees which companies that hold B-integrated environmental permits pay range from 915 to 22,860 denars.**
- **The big discrepancies regarding the municipalities' income from this point to the conclusion that there is no uniform way of calculating the fees for B-integrated environmental permits.**
- **Considering the fact that the annual fees for most of the installations that hold B-integrated environmental permits are identical every year, we can infer that some of the installations do not even submit annual reports on pollution measurements and their annual fee is not fully determined.**

- All data on the realized income from B-integrated environmental permits is provided by utilizing the Law on Free Access to Public Information. **The municipalities do not have the practice of informing the citizens about the income they receive from companies that are holders of B-integrated environmental permits. The absence of transparency increases the risk of abuses.**
- **Every second municipality faces a deficit of environmental inspectors.**
- The noted weaknesses in issuing B-integrated environmental permits **increases the risks of abuse and of corruption in the field of environment.**





GOAL OF THE RESEARCH

The goal of the research is to map the current practices as regards issuing B-integrated environmental permits primarily due to the noted increased problems with environmental protection in the country. In the National Strategy for Prevention of Corruption and Conflict of Interest (2021-2025) it is stated that this sector is becoming more significant in the past years due to the introduction of various ecological and other types of permits that the business entities should hold in order to begin/perform their operational activities. This research is motivated by the risk of corruption during the process which imposes the necessity of analyzing the existing practices, detecting the problems and preparing appropriate recommendations in order to increase the transparency and integrity of these procedures.

The Law on Environment regulates the manner of protection, renewal and improvement of the environmental quality, protection of peoples' lives and health which entails anticipation, monitoring, restricting and eliminating negative environmental influences. In order to reduce pollution and increase environmental standards by achieving economic development without environmental degradation, in accordance with the law integrated environmental permits for polluters have been introduced. Depending on the type and scope of activities, which are determined according to an appropriate threshold of installed production capacities or type of raw material used in the production processes, the installations need to have an A-integrated environmental permit issued by the Ministry of Environment and Physical Planning or a B-integrated environmental permit issued by the municipalities.

The Government of RNM determines the installations for which an A and/or B-integrated environmental permit is needed with the Regulation for determining the activities of the installations for which an integrated environmental permit is issued, i.e. a permit for compliance with an operational plan and a timetable for submitting a request for a permit for compliance with an operational plan. The term installation, in the context of integrated environmental permits represents a stationary technical unit, an industrial facility where activities are carried out and which could effect emissions and pollution.

The operators of new installations with harmful emissions for the environment and for the health of the population in cases of smaller capacity installations are obligated to secure a B-integrated environmental permit. In the context of an integrated prevention and control of pollution, a permit is a written decision which authorizes the operation of the installation and which is the subject of certain conditions that guarantee that the installation complies with legal requirements.

In order to map the state of issuing B-integrated environmental permits, the Center for Civil Communications together with the non-governmental organizations involved in the conducting of the project "Safeguards against Corruption" (Youth Cultural Center – Bitola, Rural Coalition, Center for Intercultural Dialogue, Ecological Association Vila Zora Veles, Citizen's Association Research and Analysis Centre NOVUS Strumica, Association Multikultura, Citizens' Association ZIP Institute for Politics and Good Governance and EHO Educational-Humanitarian Organization) submitted identical requests for information to the eight municipalities included in the project. The following information was requested from the municipalities of Bitola, Kicevo, Kumanovo, Negotino, Tetovo, Strumica, Cair and Stip: how many industrial capacities/installation function on the territory of their municipality; have they established a Register of polluters; how many B-integrated environmental permits have they issued during the period 2018-2022; has the MEPP issued B-integrated environmental permits to operators on behalf of the municipality and what is the number of projected job posts in this area in the act for systematization and organization of job posts in the municipality; has a Rulebook for determining the conditions for issuing B-integrated environmental permits been prepared/adopted; how much is the realized income for the period 2018-2022 on all accounts related to B-integrated environmental permits for each installation individually; how many systematized and how many filled job posts – authorized environmental inspectors are there in the municipality; if there is no employed authorized environmental inspector in the municipality, who performs the inspection surveillance activities; has the state inspectorate controlled the work of the authorized inspectors during the period 2018-2022; how many regular, extraordinary and control inspection supervisions were planned and how many were conducted during the period 2018-2022; how many B-integrated environmental permits have been revoked due to violation of the mandatory conditions established by the permit during the period 2018-2022; to submit the annual operational programs and reports for conducting inspection supervisions for the period 2018-2022; how are the conditions at installations that emit hazardous substances and that have B-integrated environmental permits monitored; do they have data on the manner in which the operators of the installations monitor the emissions from their activities that impact the environment and are the operators obligated to submit these data to the municipality and how were the funds collected from the fees for issued B-integrated environmental permits used.

The research is prepared from the information received from the municipalities.



RESEARCH ON THE PROCESS OF ISSUING B-INTEGRATED ENVIRONMENTAL PERMITS



- No one in the country has precise data on the number of B-integrated environmental permits that the municipalities have issued to companies whose operations impact the environment. According to the Registry of the Ministry of Environment and Physical Planning, there are 278 companies which are holders of B-integrated environmental permits. However, the research has shown that some of the permits issued by the municipalities are not published in the Register, whereas other companies that hold these permits are still in the Registry even though they have closed the installations.

The municipalities issue the B-integrated environmental permits. In cases when the installation is located in a protected area, in accordance with the law the Ministry of Environment and Physical Planning is the body responsible for issuing B-integrated environmental permits. The mayor of the municipality is obligated to keep a municipal registry of B-integrated environmental permits for their region, as well as to submit a copy to the MEPP where the Single Register of B-integrated environmental permits is kept and maintained.

[The Single Register of issued B-integrated environmental permits](#) is published on the webpage of the Ministry but not all of the issued B-integrated environmental permits are registered.

The research has shown that the Single Register of issued B-integrated environmental permits kept by the Ministry of Environment and Physical Planning on the one hand does not include the companies that have been issued B-integrated environmental permits and on the other hand companies which no longer hold these permits are still registered in it. Consequently, 5 companies to which the Municipality of Negotino has issued B-integrated environmental permits in the previous period cannot be found in the Single Register, yet in it is the name of a company from Kumanovo whose permit has expired and whose installation for which the permit was issued is closed.

More specifically, according to the findings from the research, the following companies are missing from the Single Register of issued B-integrated environmental permits: Junior-trade LLC and CPTS VS-GD LLC Kavadarci for which the B-integrated environmental permits were issued in 2015, then CPTS Vardar Pesok LLC with a permit issued in 2017, CPTS International Fresh Food LLC with a permit from 2021 and the construction company Granit with a permit from 2023. The Municipality of Negotino has issued B-integrated environmental permits for these companies but they are not in the Single Register kept by the MEPP. On the other hand, changes for some of the installations are not registered in the Single Register as regards holding B-integrated environmental permits (for example Mlekara Zdravje Radovo LLC). In the response received from the Municipality of Kumanovo they state that the permit for the installation of the dairy has expired and that the installation is closed, but this change is not entered in the Register. According to this, the number of installations that hold B-integrated environmental permits in the country cannot be determined since some installations are missing in the Register and others have not been deleted from it.

In accordance with the Law on Environment, the mayors are obligated to keep municipal, i.e. city registers (for the City of Skopje) of B-integrated environmental permits for their region, as well as to submit a copy to the state organ responsible for environmental issues (MEPP).

Regarding the municipalities, the conducted research has shown that those which have issued B-integrated environmental permits are accordingly keeping municipal registers of this. However, there is a noted inconsistency of data from the Single Register of issued B-integrated environmental permits which is kept by the Ministry of Environment and Physical Planning.

Municipal registers of B-integrated environmental permits

Municipality	The municipality has a register of B-integrated environmental permits
Bitola	yes
Kicevo	yes
Kumanovo	yes
Negotino	yes
Strumica	yes
Tetovo	They have not issued B-integrated environmental permits which is why they do not have a register
Cair	They have not issued B-integrated environmental permits which is why they do not have a register
Stip	yes

Apart from the Single Register of issued B-integrated environmental permits which can be found on the webpage of the Ministry of Environment and Physical Planning, the Ministry has also prepared a web platform www.registers.mk dedicated to A and B environmental permits. The research finds that this platform also has a lot of weaknesses since it has last been updated in 2022 and since it also lacks all the permits issued after 2022. This double registering of holders of integrated permits can additionally cause confusion among the citizens who are interested in checking whether a certain company holds such a permit.

- **No one has an answer to the question of which companies should hold a B-integrated environmental permit. The country does not have an integrated system that includes all industrial facilities that through their operations emit substances which are harmful for the environment. The municipalities do not have registers of polluters.**

According to the data from the State Statistical Office, there are a total of 73,061 active business entities in the country. Even though there is a precise number of active business entities and their distribution by sectors according to the National Classification of Activities, the precise number of companies that realize activities according to which they should hold B-integrated environmental permits is unknown. One quarter or 18,965 of these companies are located on the territory of the municipalities of Bitola, Negotino, Kicevo, Kumanovo, Strumica, Tetovo, Cair and Stip which are subject to this research.

According to the data received through the requests for free access to public information, 56 B-integrated environmental permits have been issued in these eight municipalities. The majority of them have been issued in the Municipality of Stip – 14, one less in the Municipality of Strumica – 13, 11 in the Municipality of Kumanovo, and 7 in the Municipality of Bitola. The Municipality of Negotino has issued 5 B-integrated environmental permits. There are 3 B-integrated environmental permits issued on the territory of the Municipality of Tetovo, but by the Ministry of Environment and Physical Planning since they are located in a protected area. The Municipality of Kicevo has issued two permits. The least permits have been issued in the Municipality of Cair, only one, and the B-integrated environmental permit was issued by the City of Skopje to the Company for Supply of Steam and Hot Water Skopje Sever AD Skopje.

The number of issued B-integrated environmental permits in relation to the number of industrial facilities in the municipalities indicates that in all of them the share is less than 1%. However, the Municipality of Stip has a share of 0.76% and the Municipality of Cair only 0.05%.

B-integrated environmental permits issued

Municipality	Total number of B-integrated environmental permits issued	Number of industrial facilities	Permits issued in relation to the number of industrial facilities
Stip	14	1,854	0.76%
Strumica	13	2,394	0.54%
Kumanovo	11	3,019	0.36%
Bitola	7	3,829	0.18%
Negotino	5	765	0.65%
Tetovo	3	3,707	0.08%
Kicevo	2	1,462	0.14%
Cair	1	1,935	0.05%

During the period 2018-2022, the eight municipalities issued 23 B-integrated environmental permits. The majority of them, or nine, were issued by the Municipality of Kumanovo, seven by the Municipality of Stip, three by the Municipality of Bitola, two by the Municipality of Strumica and the municipalities of Kicevo and Negotino issued one permit each.

Number of B-integrated environmental permits issued by the municipalities and the MEPP

Municipality	Number of B-integrated environmental permits issued during the period 2018-2022	Number of permits issued by the Ministry of Environment and Physical Planning
Kumanovo	9	0
Stip	7	0
Bitola	3	0
Strumica	2	0
Kicevo	1	0
Negotino	1	0
Tetovo	0	3
Cair	B-integrated environmental permits are issued by the City of Skopje	0

During this period the eight municipalities reissued a total of 10 B-integrated environmental permits. The mayor has an obligation to check the conditions determined with the permit every seven years and if there are changes in the regulations for environmental protection that can impact the operations of the installations, they are obligated to initiate a procedure for amending the B-integrated environmental permit. None of the eight municipalities revoked a B-integrated environmental permit during the stated period from any installation that holds a permit.

Number of reissued B-integrated environmental permits

Municipality	Reissued B-integrated environmental permits
Kumanovo	5
Strumica	3
Bitola	1
Negotino	1
Kicevo	0
Tetovo	0
Cair	B-integrated environmental permits are reissued by the City of Skopje
Stip	0

In order to issue a B-integrated environmental permit, the municipalities need to have at least one designated person in the local administration who has undergone professional training in the field of natural and technical sciences.

People who work on issuing B-integrated environmental permits

Municipality	Number of people who work on issuing the permits	Total number of B-integrated environmental permits issued
Stip	2	14
Strumica	2	13
Bitola	2	7
Kumanovo	1	11
Negotino	1	4
Kicevo	1	2
Tetovo	0	3
Cair	0	1

As can be seen from the table, six of the eight municipalities have a dedicated person that issues the permits. The municipalities of Tetovo and Cair have not issued these types of permits, so they do not have a dedicated person. In the municipalities of Negotino and Kicevo, according to the systematization, a large number of people (seven and two) working in this field have been projected, but there is only one dedicated person. Whereas after the systematization in the Municipality of Bitola one person was projected, but there are two people employed for this position.

- The municipalities have no registers of polluters. Some of them have prepared a so-called cadaster of polluters, but at the level of industries and not individual companies.

According to the Rulebook on the form, content, methodology and manner of keeping a register on discharge and transport of polluters, they should contain data on the installation with all its plants and its geographical location, the discharge of pollutants in the environmental media (air, water and soil), creating and transporting waste outside the locations and their destination, etc. None of the municipalities have prepared these types of registers.

Nevertheless, from the eight municipalities included in this project, only the municipalities of Bitola, Kicevo and Kumanovo have prepared a so-called cadaster of polluters at the level of industries, but the individual installations or the pollution from them is not stated. The municipalities of Stip and Tetovo informed us that they are part of a project by the Ministry of Environment and Physical Planning aimed at creating cadasters of polluters.

Considering that they have not prepared registers of polluters, it cannot be expected that the municipalities know the number of companies that should hold a B-integrated environmental permit, i.e. whether all the companies that should hold a permit have applied for it.

- **Although companies that are holders of B-integrated environmental permits should pay fees on several accounts, even the big municipalities collect only a few thousand denars annually from this fee. This creates doubt whether the municipalities charge all the companies the fees for holding B-integrated environmental permits. Moreover, it can be noted that some of the companies do not regularly pay even such low fees.**

According to the Law on Environment, the installations that hold B-integrated environmental permits are obligated to pay fees to the municipality on several accounts: submitting a request, change of permit, transfer of permit, annual fee for holding a permit, annual fee for regular supervision and a fee for closing an installation. The amount of the fees is determined based on the number of places in the installation from which emissions are discharged in the environment, the number of mandatory conditions and measures determined in the permit, the type and size of emissions into the environment, as well as the surface that the installation occupies. More precisely, the amount of the fees is determined with a Regulation on the amount of fees to be paid by the operators of installations that carry out activities for B-integrated environmental permits.

According to the data received for the installations, it can be noted that the annual fees which the companies that are holders of B-integrated environmental permits pay range from 915 to 22,860 denars.

For the municipalities on the other hand, the research indicated that the income generated from these fees is exceptionally modest. During the five year period 2018-2022, the analyzed municipalities on average generated an annual income that ranged from only 1,220 to 165,017 denars.

The big discrepancies in the generated income regarding the B-integrated environmental permits creates doubt whether the municipalities charge the annual fee for holding B-integrated environmental permits to all permit holders.

As can be seen from the table, the Municipality of Strumica generates the most average income annually – 165,017 denars (2,680 euros). Next is the Municipality of Kumanovo with 146,204 denars or around 2,400 euros annually. In third place is the Municipality of Negotino with an annual income on this account of 35,000 denars (570 euros). Then follows the Municipality of Stip which on average annually charged the 14 installations that hold B-integrated environmental permits to pay 19,308 denars (320 euros). The Municipality of Kicevo is in fifth place with an income of 10,230 denars or 170 euros. Even though the Municipality of Bitola has 7 installations which are holders of B-integrated environmental permits, it has generated an average annual income of only 1,220 denars or 20 euros. The municipalities of Tetovo and Cair have not generated income because they do not issue the permits but the Ministry of Environment and Physical Planning and the City of Skopje do.

Average income from the B-integrated environmental permits during the period 2018-2022

Municipality	Number of permits issued	Average annual income in denars
Strumica	13	165,017
Kumanovo	11	146,204
Negotino	4	35,000
Stip	14	19,308
Kicevo	2	10,230
Bitola	7	1,220
Tetovo	3	0
Cair	1	0

Annually, during the period 2018-2022 the Municipality of Bitola planned to generate an income of 10 thousand denars from the B-integrated environmental permits, but it did not achieve even these low projections. Thus the municipality which issued 7 permits in 2018 had no income at all from this, in 2020 only 1,890 denars were generated, in 2021 modest 1,363 denars and 2,847 denars in 2022. The low level of projection of these incomes indicates the risk that the municipality does not keep precise records and does not charge fees for annual holding of B-integrated environmental permits.

The Municipality of Kicevo also had exceptionally low annual incomes. In 2018 the municipality received 10,200 denars on its account; the sum for 2019, 2020 and 2021 was identical and amounted to 7,210 denars per year and in 2022 it was 19,310 denars.

After the request for free access to public information, the Municipality of Stip only delivered a list of the installations that hold B-integrated environmental permits and the amount of the fee that they have to pay for holding B-integrated environmental permits and for regular supervision. Hence, we do not have data on the annual incomes but the total income generated during the period 2018-2022. Also, we do not know whether these fees were even paid in full.

The generated incomes of the Municipality of Negotino on all accounts for B-integrated environmental permits issued during the period 2018-2022 remain the same and each year amount to only 35,000 denars.

The Municipality of Kumanovo had the highest income from B-integrated environmental permits in 2021 or 255,392 denars and the lowest in 2019 or 79,241 denars.

In 2018 and 2019 the Municipality of Strumica generated an income of 171,424 denars per year from the fees. In 2020 the income was 138,164 denars, then 163,548 denars in 2021 and 180,527 denars in 2022.

Income from fees for B-integrated environmental permits during the period 2018-2022

Municipality	Number of permits issued	2018	2019	2020	2021	2022
Strumica	13	171,424	171,424	138,164	163,548	180,527
Kumanovo	11	166,480	79,241	98,394	255,392	131,511
Negotino	4	35,000	35,000	35,000	35,000	35,000
Kicevo	2	10,210	7,210	7,210	7,210	19,310
Bitola	7	0	/	1,890	1,363	2,847
Stip	14	Did not submit the annual data	Did not submit the annual data	Did not submit the annual data	Did not submit the annual data	Did not submit the annual data
Tetovo	3	0	0	0	0	0
Cair	1	0	0	0	0	0

- All the data on the generated income from the B-integrated environmental permits was provided by using the Law on Free Access to Public Information. The municipalities do not inform the citizens about the incomes generated from companies that are holders of B-integrated environmental permits. The lack of transparency increases the risk of abuse.

The annual fees that the companies which are holders of B-integrated environmental permits pay range between 915 denars and 22,860 denars.

Based on the Law on Free Access to Public Information, the municipalities included in this research were asked to submit data on the amount of incomes generated during the period 2018-2022 on all accounts related to B-integrated environmental permits for every installation individually. However, only some of the municipalities submitted the data.

The municipalities of Strumica and Kicevo submitted detailed information about the generated incomes from the installations that hold B-integrated environmental permits, individually for each installation. Whereas the municipalities of Bitola, Negotino and Kumanovo submitted the total generated income for the period 2018-2022. The Municipality of Stip submitted information only on the amount of the fees that the installations have to pay, but not information on the generated income. The municipalities of Cair and Tetovo do not generate incomes because they have not issued any B-integrated environmental permits.

The annual fees that the companies that hold B-integrated environmental permits pay range from 915 denars to 22,860 denars. The submitted data indicate that the Municipality of Bitola charged IMV Industry for Milk Velkovski with the lowest amount of 915 denars. The other installations which hold B-integrated environmental permits pay an annual fee of 1,890 denars. The installation from Strumica for production of concrete DG Beton PM LLC Strumica is charged the highest annual fee or 22,860 denars. The remaining installations in Strumica pay from 4,690 to 19,200 denars. The installations that hold B-integrated environmental permits in the Municipality of Stip have to pay from 3,721 denars to 22,580 denars, whereas those in Kicevo pay from 7,210 denars to 8,100 denars.

Considering that nearly all the municipalities responded that the incomes generated from B-integrated environmental permits are used for programs or activities for environmental protection, it is important to state that only a part of the monitored municipalities have an environmental program, specifically only Strumica, Kumanovo, Bitola and Negotino.

The value of these programs in the total budgets ranges from modest 0.36% in Negotino to 2.01% in the Municipality of Strumica. As regards the share of generated incomes from the B-integrated environmental permits in the funding of the environmental programs, the smallest share is in Bitola with 0.03% and the largest in Strumica with 7.37%.

Value of the environmental programs

Municipality	Budgets for 2022	Environmental program for 2022	Share of the program in the budget of the municipality	Percentage of program funding from income from B-integrated environmental permits
Strumica	1.217.311.189	24.500.000	2.01%	7.37%
Kumanovo	1.859.090.286	29.998.000	1.61%	0.44%
Bitola	1.858.404.537	9.500.000	0.51%	0.03%
Negotino	373.022.919	1.330.000	0.36%	2.63%
Kicevo	804.790.174	/	/	/
Tetovo	1.526.335.202	/	/	/
Cair	838.511.179	/	/	/
Stip	948.401.295	/	/	/

The data on the environmental programs was provided from the webpages of the municipalities.

- Considering that the annual fees for most of the installations that hold B-integrated environmental permits are the same each year, we can infer that some of the installations do not even submit annual reports on the measurements and their fee for B-permits issued is not completely determined. An additional problem is that some of the municipalities do not even have authorized environmental inspectors.

All the municipalities state that the installations that hold B-integrated environmental permits, in accordance with the permits, are obligated to monitor the environmental emissions and at least once a year submit expert reports to the municipality from the monitoring conducted by an accredited subject. In cases when the authorized environmental inspector needs additional information, they have the right to ask for additional measurements of emissions.

Some of the municipalities do not have authorized environmental inspectors. More specifically, the municipalities of Kicevo and Negotino do not have authorized environmental inspectors. In the Municipality of Kicevo there is an inspector with an authorization and in the Municipality of Negotino the person employed is not an authorized inspector. The authorized environmental inspector in the Municipality of Cair was employed in 2023. The Municipality of Tetovo has five licensed environmental inspectors, the Municipality of Kumanovo two, whereas the municipalities of Bitola, Strumica and Stip each have one authorized environmental inspector.

Authorized environmental inspectors

Municipality	Number of authorized environmental inspectors in the municipality
Bitola	1
Kicevo	There is no authorized inspector, only 1 inspector with an authorization
Kumanovo	2
Negotino	There is no authorized inspector
Strumica	1
Tetovo	5
Cair	1 (The inspector was employed in 2023)
Stip	1

During the period 2018-2022, the municipalities of Negotino and Cair (obligation of the City of Skopje) did not conduct inspection supervisions. The Municipality of Kicevo conducted only three control supervisions, whereas the municipalities of Bitola, Kumanovo and Tetovo continually conducted supervisions throughout the entire period. The municipalities of Strumica and Stip have partial data because the inspectors which were working in the municipalities no longer work there so data is missing on the supervisions conducted during that period.

The Municipality of Tetovo states that they do not have the data for the individual years, but the total for the five-year period is 650.

Total number of conducted regular, extraordinary and control supervisions in the municipalities

Municipality	2018	2019	2020	2021	2022
Bitola	142	71	20	53	77
Kicevo	0	0	0	0	3
Kumanovo	172	153	87	183	157
Negotino	0	0	0	0	0
Strumica	The municipality does not have the data	The municipality does not have the data	The municipality does not have the data	The municipality does not have the data	108
Tetovo	The municipality does not have the data	The municipality does not have the data	The municipality does not have the data	The municipality does not have the data	The municipality does not have the data
Cair	0	0	0	0	0
Stip	The municipality does not have the data	The municipality does not have the data	7 (The municipality did not have an environmental inspector)	18 (The municipality did not have an environmental inspector)	4 (The municipality did not have an environmental inspector)

The Municipality of Stip informed us that for 2018 and 2019 they do not have data because the previous inspector no longer works in the municipality, and during the period 2019-2022 there was no environmental inspector in the municipality. The urgent supervisions were conducted by the head of the inspection department.

RECOMMENDATIONS

- » Keeping precise records of the B-integrated environmental permits issued both at the municipal and state level and ensuring citizens' access to this data.
- » Establishing an integrated system and control mechanism through which the industrial installations, i.e. facilities that with their activities emit harmful substances in the environment will be fully covered and hence should be holders of B-integrated environmental permits.
- » More frequent non-selective and non-subjective controls to find installations that should but have not submitted a request for obtaining a B-integrated permit, as well as for entities that hold permits of this type in order to protect the environment.
- » Initiating legislation changes to correct the formula used to determine the amount of fees that should be paid by the installations that hold B-integrated permits.
- » Municipalities should annually provide notifications from operators of installations on the amount of polluting substances and use this data in the calculation of the annual fee for holding a B-integrated environmental permit.
- » Municipalities should calculate the fees for annual holding of a B-integrated permit for all permit holders and keep track of the timely collection of these claims.
- » Establishing a uniform way of calculating the fees for B-integrated environmental permits and initiating legislation changes to determine more specific guidelines for the intended use of the collected fees.
- » Filling all the projected job posts for authorized environmental inspectors in the local self-governments in order to conduct continuous regular, extraordinary and control supervisions of the industrial facilities.

