



Activity EFH-PS-3 (merged with EFH-PS-2)

Provide technical assistance for addressing industrial pollution and supporting environmental inspection and inventory for the Olive Oil and the Tanning industries of Palestine

Task 2 deliverable: Technical inspection manual for the Olive Oil and Tanning industries
(in fact for most types of industries)

Version	Document Title	Author	Review and Clearance
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THE SWIM AND H2020 SUPPORT MECHANISM PROJECT (2016-2019)

The SWIM-H2020 SM is a Regional Technical Support Program that includes the following Partner Countries (PCs): Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine, [Syria] and Tunisia. However, in order to ensure the coherence and effectiveness of Union financing or to foster regional co-operation, eligibility of specific actions will be extended to the Western Balkan countries (Albania, Bosnia Herzegovina and Montenegro), Turkey and Mauritania. The Program is funded by the European Neighbourhood Instrument (ENI) South/Environment. It ensures the continuation of EU's regional support to ENP South countries in the fields of water management, marine pollution prevention and adds value to other important EU-funded regional programs in related fields, in particular the SWITCH-Med program, and the Clima South program, as well as to projects under the EU bilateral programming, where environment and water are identified as priority sectors for the EU co-operation. It complements and provides operational partnerships and links with the projects labelled by the Union for the Mediterranean, project preparation facilities in particular MESHIP phase II and with the next phase of the ENPI-SEIS project on environmental information systems, whereas its work plan will be coherent with, and supportive of, the Barcelona Convention and its Mediterranean Action Plan.

The overall objective of the Program is to contribute to reduced marine pollution and a more sustainable use of scarce water resources. The Technical Assistance services are grouped in 6 work packages: WP1. Expert facility, WP2. Peer-to-peer experience sharing and dialogue, WP3. Training activities, WP4. Communication and visibility, WP5. Capitalizing the lessons learnt, good practices and success stories and WP6. Support activities.



This document is the deliverable of Task 2 of the activity EFH-PS-2&3 **“Supporting environmental inspection for the Olive Oil and Tanning industries in Palestine”**. It takes into consideration the information exchange that occurred during a relevant training that took place in Ramallah on 30-31 January 2019 under SWIM-H2020 SM.

Disclaimer:

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PREAMBLE

The 2017 – 2022 National Policy Agenda of Palestine includes provisions for industrial waste: reduce and effectively control pollution and greenhouse gas emissions; expand solid waste management and recycling. At the same time, institutions in Palestine need support and technical assistance in the environmental inspection procedures and enforcement of environmental legislations.

Leather tanning wastewater in Palestine is highly polluted with Cr (III). International environmental standards require that chromium in wastewater should not exceed 5 mg L^{-1} for Cr (III) and 0.05 mg L^{-1} from Cr (VI).

Olive oil mill wastewater (OMW) is considered as one of the most polluting waste waters from the food sector and causes great problems in biota and cultivations untreated in soil or aquatic systems. It has a very high COD, i.e. $200\,000 \text{ mg/l}$, a low pH, i.e. 3-5.9, and a high content of solid matter, i.e. TSS $20\,000 \text{ mg/l}$. In addition, the high polyphenol content of olive mill wastewater, up to $80\,000 \text{ mg/l}$, make bacterial degradation very difficult and give them phytotoxic characteristics.

Much like in other regions of the world, the olive mills in Palestine contribute to the core problem of surface and groundwater pollution. The wastewater from the different olive mills located in and around the different villages in the West Bank is being disposed into the wadies. The olive mill wastewater is then mixed with the flowing untreated municipal wastewater or with rainwater. The high organic polluted wastewater affects the soil, groundwater and water courses downstream. This occurs mainly during the olive season, generally from early October to late December.

The proposed activity will support the relevant national and local institutions in enforcing national and international standards and laws, applying Environmental Impact Assessments, and inspection of tanning facilities and olive oil mills.

Initially the Work Programme of SWIM- H2020 SM had two different activities, one entitled “Provide technical assistance for addressing industrial pollution focusing on the tanning and olive oil industries” and another on “Support in environmental inspection and enforcement of environmental legislation”.

However, a joint decision (of the project and National Horizon 2020 Focal Point) was taken to merge the two activities into one: Provide technical assistance for addressing industrial pollution, supporting environmental inspection and enforcing environmental legislation for the Olive Oil and the Tanning industries in Palestine.



1 ENFORCEMENT AND INSPECTIONS

‘Environmental inspection’ means all actions, including site visits, monitoring of emissions and checks of internal reports and follow-up documents, verification of self-monitoring, checking of the techniques used and adequacy of the environment management of the installation, undertaken by or on behalf of the competent authority to check and promote compliance of installations with their permit conditions and, where necessary, to monitor their environmental impact.

Regulations are indispensable for the proper function of economies and the society. They create the “rules of the game” for citizens, business, government and civil society. They underpin markets, protect the rights and safety of citizens and ensure the delivery of public goods and services. The objective of regulatory policy is to ensure that the regulatory lever works effectively, so that regulations and regulatory frameworks are in the public interest.

The quality of the regulatory environment and the delivery of regulatory outcomes is not only based on how regulations are designed. In the last decade, OECD countries have been investing time and resources in examining the need for regulation and assessing regulatory options. Most governments have outlined their policy on improving the design of regulation through regulatory impact analysis and stakeholder engagement mechanisms, often with the support of central scrutiny for proposed new regulations. As well as improving the design of new regulation, nearly all OECD countries have searched for opportunities to remove unnecessary burdens on the business community and citizens.

Regulatory enforcement has been overshadowed by these initiatives in most OECD countries so far. Scarce attention has been paid to examining possibilities for improving the way regulations are implemented and enforced. Nonetheless, the delivery of regulatory outcomes cannot be effective without a proper enforcement of regulations. Inspections are one of the most important ways to enforce regulations and to ensure regulatory compliance. Even though inspections are usually considered as sector specific, there are many core activities that inspections have in common and that are universal for all or most sectors where inspections take place.

The way inspections are planned, their better targeting, communication with regulated subjects, preventing corruption and ethical behaviour – these are just few examples of issues that can be addressed generally, across sectors and inspection authorities. The organisation of inspections and the governance of inspection authorities are other issues that could and should be solved through a cross-cutting policy. Regulators in many countries are increasingly under pressure to do “more with less”. While demands to better protect environment, health and safety of citizens have increased, the current economic crisis forces governments to reduce spending on public administration, including regulatory enforcement activities. In addition, inspections often create unnecessary burdens both for the state and those inspected. A well-formulated enforcement strategy, providing correct incentives for regulated subjects can help reduce monitoring efforts and thus the costs for both business and the public sector, while increasing the efficiency and achieving better regulatory goals.

The OECD has played a leading role in the international community to promote regulatory reform and the implementation of sound regulatory practices on a whole-of-government approach. The body of



information and experience it has gathered is summarised in the Recommendation of the Council on Regulatory and Policy Governance (OECD, 2012).

The report Regulatory Enforcement and Inspections: OECD Best Practice Principles for Regulatory Policy complements the 2012 Recommendation and is intended to assist countries in reforming inspections and developing cross-cutting policies on regulatory enforcement. The principles seek to construct an overarching framework to support initiatives on improving regulatory enforcement through inspections, making them more effective, efficient, less burdensome for those who are inspected and at the same time less resource-demanding for governments.



2 INTERNATIONAL BEST PRACTICE PRINCIPLES

Ensuring effective compliance with rules and regulations is an important factor in creating a well-functioning society and trust in government. It is a major element in safeguarding health and safety, protecting the environment, securing stable state revenue and delivering other essential public goals. This is critically important from a social perspective and as a foundation of economic growth. The challenge for governments is to develop and apply enforcement strategies that achieve the best possible outcomes by achieving the highest possible levels of compliance, while keeping the costs and burden as low as possible.

A well-formulated enforcement strategy is one that provides correct incentives for regulated subjects as well as appropriate guidelines for enforcement staff, and minimises both the monitoring effort and the costs for the regulated subjects and the public sector. To achieve this, any strategy needs to rely on a clear and sound vision of what the drivers of compliance are – both in terms of the effect of activities of the regulatory bodies, but also in terms of characteristics of the regulated businesses and of external factors (in particular market characteristics). An increasing number of OECD countries are coming to realise the importance of the enforcement phase in ensuring the quality and effectiveness of regulatory policy and delivery and for reducing the overall level of regulatory burdens imposed on businesses and citizens.

Increased attention is being given to the efficiency of the enforcement phase in the regulatory governance cycle and promoting proportionality in enforcement (proportionality being here understood both as allocation of resources proportional to the level of risk, and to enforcement actions proportional to the seriousness of the violation). Governments increasingly understand that this can help reduce burdens on business and citizens and release public resources for more productive tasks – while in fact improving the desired outcomes. Achieving efficiency improvements can follow from a review of the overall policies, the institutional framework and the tools used by regulatory agencies. It corresponds to a greater reliance on risk analysis and on a more targeted approach to the use of inspection and enforcement resources.

In order to improve the regulatory enforcement and inspections the following best practice principles need to be followed:

- 1. Evidence-based enforcement.** Regulatory enforcement and inspections should be evidence-based and measurement-based: deciding what to inspect and how, should be grounded on data and evidence, and results should be evaluated regularly.
- 2. Selectivity.** Promoting compliance and enforcing rules should be left to market forces, private sector and civil society actions wherever possible: inspections and enforcement cannot be everywhere and address everything, and there are many other ways to achieve regulatory objectives.
- 3. Risk focus and proportionality.** Enforcement needs to be risk-based and proportionate: the frequency of inspections and the resources employed should be proportional to the level of risk and enforcement actions should be aiming at reducing the actual risk posed by infractions.



4. Responsive regulation. Enforcement should be based on “responsive regulation” principles: inspection enforcement actions should be modulated depending on the profile and behaviour of specific businesses.

5. Long term vision. Governments should adopt policies and institutional mechanisms on regulatory enforcement and inspections with clear objectives and a long-term road-map.

6. Co-ordination and consolidation. Inspection functions should be co-ordinated and, where needed, consolidated: less duplication and overlaps will ensure better use of public resources, minimise burden on regulated subjects, and maximise effectiveness.

7. Transparent governance. Governance structures and human resources policies for regulatory enforcement should support transparency, professionalism, and results-oriented management. Execution of regulatory enforcement should be independent from political influence, and compliance promotion efforts should be rewarded.

8. Information integration. Information and communication technologies should be used to maximise risk-focus, co-ordination and information-sharing – as well as optimal use of resources.

9. Clear and fair process. The government should ensure clarity of rules and process for enforcement and inspections: coherent legislation to organise inspections and enforcement needs to be adopted and published, and clearly articulate rights and obligations of officials and of businesses.

10. Compliance promotion. Transparency and compliance should be promoted through the use of appropriate instruments such as guidance, toolkits and checklists.

11. Professionalism. Inspectors should be trained and managed to ensure professionalism, integrity, consistency and transparency: this requires substantial training focusing not only on technical but also on generic inspection skills, and official guidelines for inspectors to help ensure consistency and fairness.



3 STEP BY STEP PLANNING OF ENVIRONMENTAL INSPECTION

Each environmental inspection plan should include the following:

- (a) a general assessment of relevant significant environmental issues;
- (b) the geographical area covered by the inspection plan;
- (c) a register of the installations covered by the plan;
- (d) procedures for drawing up programmes for routine environmental inspections;
- (e) procedures for non-routine environmental inspections;
- (f) where necessary, provisions on the cooperation between different inspection authorities.

Based on the inspection plans, the competent authority should regularly draw up programmes for routine environmental inspections, including the frequency of site visits for different types of installations.

The period between two site visits should be based on a systematic appraisal of the environmental risks of the installations concerned and should not exceed 1 year for installations posing the highest risks and 3 years for installations posing the lowest risks.

If an inspection has identified an important case of noncompliance with the permit conditions, an additional site visit should be carried out within 6 months of that inspection.

The systematic appraisal of the environmental risks should be based on at least the following criteria:

- (a) the potential and actual impacts of the installations concerned on human health and the environment taking into account the levels and types of emissions, the sensitivity of the local environment and the risk of accidents;
- (b) the record of compliance with permit conditions.

Non-routine environmental inspections should be carried out to investigate serious environmental complaints, serious environmental accidents, incidents and occurrences of non-compliance as soon as possible and, where appropriate, before the granting, reconsideration or update of a permit.

Following each site visit, the competent authority should prepare a report describing the relevant findings regarding compliance of the installation with the permit conditions and conclusions on whether any further action is necessary.

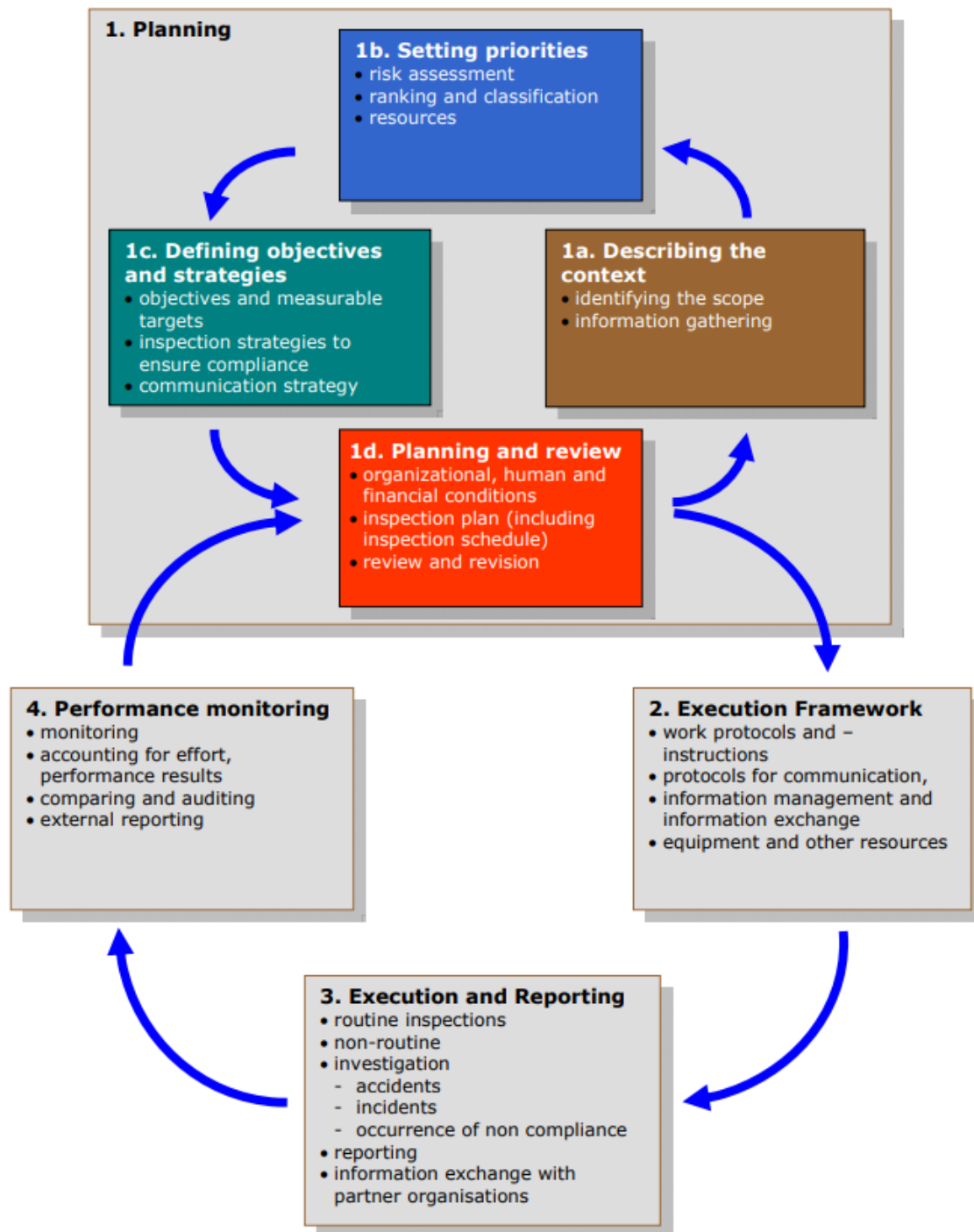


Environmental Inspection Cycle

When we look more closely at the environmental inspection cycle we notice that the process is more complicated and that it is useful to make a further distinction, resulting in the following seven steps:

1. Describing the context
2. Setting Priorities
3. Defining objectives and strategies
4. Planning and review
5. Execution framework
6. Execution and reporting
7. Performance monitoring

Steps 1, 2, 3 and 4 form **the planning process**, which is a cyclic process, since review of the inspection plan may lead to developing a new inspection plan or modifying the existing one. Steps 5, 6 and 7 take place **after the inspection plan has been finalised**. They provide input to the review of the inspection plan. Together with step 4 they also form a cycle of environmental inspection.



Source: Step-by-step guidance book for planning, IMPEL



The first step in this cyclic process is **“Describing the context”** (box 1a). Here the inspecting authority looks amongst others at its statutory tasks. This part sets the scope of the inspection plan. In addition to the identification of the scope it is necessary to gather information for performing the risk assessment.

The second step is **“Setting priorities”** (box 1b). This step starts with a risk assessment. The risk assessment will result in a list of installations or activities that are ranked and classified. In this step the priorities are also set. In other words, what will get the necessary attention (and how much) and what will not. The output of this step, the listed priorities (for the specified period), is then the input for the next step.

The third step is **“Defining objectives and strategies”** (box 1c). Within this step the inspecting authority identifies inspection objectives and targets. These objectives and targets can be presented quantitatively and/or qualitatively. When it is clear what we want to achieve we can define or modify the inspection strategies in order to meet these objectives and targets. The output of this step, the objectives, measurable targets and the inspection strategies, will be part of the input of the next step.

The fourth step is **“Planning and review”** (box 1d). In this step the inspection plan is developed. The inspection plan covers a defined time period and describes and explains the steps taken in box 1a, 1b and 1c. Part of the inspection plan is an inspection schedule. The inspection schedule may stand as a working annex to the inspection plan, or as a separate document referenced within the inspection plan.

The fifth step is **“Execution framework”** (box 2). Before inspections can be executed we have to make sure that all necessary conditions are met. The appropriate working procedures and instructions, powers and competences and equipment should be in place.

The sixth step is **“Execution and reporting”** (box 3). In this step the inspection work is done. Here the routine and non-routine inspections are executed and reports of findings are written. Data on the inspections that are carried out and their outcomes and follow-up have to be stored in **a good accessible database**.

The seventh step of the process is **“Performance monitoring”** (box 4). To make sure we meet our objectives and targets we have to monitor the output (did we carry out the planned activities?) and the outcome (what were the effects of our activities?). This information will be used for reviewing the plans and for reporting to different stakeholders, for instance the minister responsible, parliament, the general public, etc.

From the “Performance monitoring” step we return to the “Planning and review” step (box 1d). Based upon the monitoring results but also possible changes in box 1a (describing the context) the inspection plan (including the inspection schedule) will be reviewed and possibly be revised.

Describing the context (box 1a)

Describing the context is a first step of the systematic approach for planning of inspections and a necessary input for identifying and analysing the risks. A full inventory of the context within which the authority has to operate is vital to define its activities and sets the scope of the inspection plan. This scope is normally identified by elements such as the general mission and objectives of the authority and in



particular its statutory tasks and competences. It is important to keep in mind that the inspecting authority is also bound to national, regional or local policies, which are established by others. Furthermore, an inspectorate may want to take into consideration particular opinions expressed by the general public, NGOs, industry or other stakeholders. On a more detailed level, information about companies and installations that fall under the competence of the authority concerned can be gathered, including data on their environmental impact; permit situation, compliance behavior, etc. Part of this information is collected through the execution of inspection activities (box 3). This data is also assessed in the process of performance monitoring. The data that is gathered in this step is used for carrying out the risk assessment process as outlined in the next step.

Setting priorities (box 1b)

Setting priorities starts with a risk assessment. Risk should be understood here in a broad sense: it includes any factor an authority wants to take into account when assigning priorities. It may be an environmental risk, a social or economic risk, a compliance risk, etc. The method used for risk assessment should be objective in nature, simple to apply and can differ between inspecting authorities.

Limited resources on the one hand and a multitude and variety of statutory tasks on the other, make it necessary to set clear priorities. Priorities are set using the outcome of the risk assessment, which could be a list or an overview of all the identified/selected installations and activities and their respective risks. These installations and activities can on the basis of their assessed risks be classified, for example, in '*high risk*', '*medium risk*' and '*low risk*'. In addition, the inspection approach for each level can differ: the higher the risk level, the more attention it will get from the inspecting authority. The inspection approach will as a consequence also determine the claim on the available resources, and is therefore equally relevant for the inspection plan and in the inspection schedule.

An inspecting authority with a large variety of tasks may in the first instance carry out an "abstract level" risk assessment between general task areas it is charged with (e.g. inspection of industrial installations versus inspection on illegal dumping versus spatial planning); in other words, a "general" risk assessment. However a unit within an inspecting authority that is only dealing with specific areas (e.g. industrial installations) and has no other tasks, might only want to do a detailed level risk assessment ("specific" risk assessment). These different risk assessment processes are carried out in different levels of detail by the same or by different staff. Although the risk criteria might be different between these different levels of risk assessment the method could be the same. An inspecting authority may want to consult third parties when performing a risk assessment. In particular consultation of other (inspecting) authorities can provide opportunities of sharing data, performing joint risk assessments, etc. A combination of risk assessments is also possible. Carrying out a specific risk assessment further refines the outcomes of the general risk assessment. For example, in the general risk assessment priorities have been set between the different statutory tasks like inspection of industrial installations, inspection against legal requirements on nature protection, inspection of waste transport, etc. The outcome of the assessment is a risk score for every task, that can then be used as a guide to allocate available inspection time. This outcome is now the input for the specific risk assessments.



Defining objectives and strategies (box 1c)

Based upon the priorities, the inspecting authority sets targets and objectives. In order to establish whether these objectives and targets can be and will be met, the output and the outcome must be monitored. This is generally done by using performance indicators. Examples of performance indicators on outcome that may be useful are:

- The amount of incidents or complaints occurring;
- The level of compliance;
- The actual achievement of reduction targets for certain pollutants or certain risks at the sites that are directly regulated or enforced by the inspection authority;
- Improvement of air, land and water quality through the actions of the inspectorate and/or in co-operation with other authorities.

The inspecting authority may want to link its objectives with certain inspection strategies to ensure that these objectives can be met in both an effective and efficient manner, causing minimal burdens for the company and the authority. It may furthermore want to adopt and use certain communication strategies for exchanging information internally and with other competent authorities.

Subjects that can be addressed are:

- co-operation and information exchange between inspecting organisations and other authorities;
- the character and form of inspection;
- the effect of the operator's behaviour on the inspection frequency;
- the path of administrative and/or criminal follow-up upon non-compliance, which must be firm, fair and unambiguous in case of non-compliance.

Planning and review (box 1d)

Based upon the previous steps (1a, 1b and 1c), the inspecting authority should then develop its inspection plan and inspection schedule. The inspection plan can be seen as a strategic plan and does not contain operational information (e.g. it does not include the names of installations or the planned and type/dates of inspections).

An inspection plan describes:

- The objectives that the Inspecting authority, given its mission and tasks, wants to achieve;
- The policy, environmental, legal, organizational, financial and other relevant conditions under which the inspecting authority has to perform its inspection activities;
- The strategies which the inspecting authority has adopted for performing its inspection activities;
- How priorities with regard to inspection activities are set, taking into account these objectives, conditions and strategies;
- The priorities themselves.



The general public has the right to know what the inspecting authority has planned for the defined period (it should be transparent) and the plan should therefore be available to the public. However, the inspecting authority may choose to withhold part of the plan (e.g. the Inspection Schedule). This could be typically due to the inclusion of unannounced Inspections or other unannounced enforcement actions which must be without warning in order to be effective.

The inspection plan will be used to compile an inspection schedule. This schedule should include information such as names of installations, dates, type of inspections, inspectors assigned, etc.

When developing the inspection plan and inspection schedule it is necessary to consider the organisational, human and financial circumstances. Most importantly the inspection plan and the inspection schedule should be in balance with the available resources and budgets and should be in line with the organizational structure.

The review and revision of the inspection plan is also part of this step. When we continue the process, after step “Performance monitoring” (box 4), we return to this step (box 1d). Based upon the monitoring and evaluation of the inspection plan (including the inspection schedule), it will be reviewed and possibly be revised.

Execution Framework (box 2)

The execution framework serves to facilitate the different inspection activities, e.g. compliance checking through site visits, enforcement actions like imposing sanctions, compliance assistance through organising information campaigns, etc. Within this step, protocols and working instructions are developed and conditions for realisation. This step is necessary to make sure that inspection activities can be executed effectively, efficiently, professionally and consistently.

The execution framework should at least cover (in no order of preference):

- Protocols and working instructions for routine and non-routine inspections
- Procedures for imposing sanctions
- Development of inspection and enforcement handbooks
- Protocols for communication with the public (access to information) and with Industry
- Information management (e.g. information systems) and information exchange (within the organization and with partner organizations)
- Conditions for realisation
 - Clear authorisations and competencies (e.g. legal right of access to site and information)
 - System for planning, programming and monitoring
 - Facilities and materials needed (e.g. computers, transport, means of communication)
 - Maintenance and calibration of equipment

Execution and Reporting (box 3)

In this step the inspections are actually carried out: the various inspection activities (aimed at compliance checking and compliance assistance) are prepared and executed. Traditional inspection activities are the



(physical) routine (site) inspections, non-routine (site) inspections and investigations of incidents. Many of these activities can and should be executed according to standard protocols and working instructions (that have been developed in the previous step). The cooperation and information exchange with partner organisations is also part of this step.

Information on the inspection activities carried out, their results and their follow up (imposed sanctions) should be stored in an accessible database. Execution and Reporting should at least cover (in no order of preference)

- Routine site visits
 - Examining environmental impact by following:
 - ✓ inspection schedule
 - ✓ legal requirements
 - ✓ organisational arrangements of inspectorate
 - Promoting and reinforcing knowledge and understanding of operator
 - Evaluating permits and authorisations
- Non-routine site visits
 - Complaints
 - Accidents and incidents
 - Occurrences of non-compliance
 - (The need for) issuing a new permit
 - (The need for) revising a permit
- Investigation of accident/incident / occurrence of non-compliance
 - To clarify the cause and its impact
 - Responsibilities, liabilities and consequences
 - Forward conclusions to the inspecting authority
 - Follow up that has to be taken
- Actions to mitigate / remedy the impact
- Actions for prevention
- Actions taken by the operator
- Actions and enforcement actions
- Other compliance checking and compliance assistance activities like assessing operator monitoring data, organising information campaigns etc.
- Reporting
 - After every site visit
 - Process/ store inspection data
 - Evaluation for further actions
 - Finalised a.s.a.p.
 - Keep record of reports
 - Accessible database
 - Communicated to operator
 - Publicly available
- Exchange information with partner organisations



Performance monitoring (box 4)

The inspecting authority should act on the basis of systematic monitoring of the inspection and enforcement process and its result and effects. Performance monitoring is necessary so the inspecting authority can report internally or at national level and check if objectives and targets have been met.

It is important to use meaningful performance indicators to assess the effectiveness of the inspection plan. Insight into their effectiveness can help to determine which tools and strategies are working best to ensure compliance and to allow the public and stakeholders to examine whether the inspecting authority is meeting its responsibilities. This monitoring can take place on different levels. On the inspection schedule level, regular monitoring of progress should be carried out in relation to performance indicators (e.g. planned number of inspections vs. actual inspections carried out). This should inform execution of the schedule and may be carried out for example on a six-monthly or quarterly basis. This should also include monitoring of actions taken as result of inspections or complaints e.g. legal notices issued.

Performance monitoring should also take place at a higher level in relation to the success of the plan. This could include measurement against plan outcomes, against the objectives and measurable targets (e.g. general environmental improvements, increase in compliance rate), and external reporting of plan outputs/outcomes to national level, etc.

Performance monitoring should at least cover (in no order of preferences):

- Monitoring
 - Performance of staff (output)
 - Monitoring of the results (outcome)
- Accounting for effort, performance results
 - Annual reports
 - Report on the agreements with other inspecting organisations
 - Input in the regulatory cycle
 - Feed back on the results and recommendations
- Comparing and auditing
- External reporting
 - Available to public
 - Regional and local level to public and National level
 - Data about staffing and resources
 - Role and performance in relation to inspection plan
 - Summary of the inspections carried out
 - Degree of compliance
 - Actions taken as result of complaints and accidents and incidents
 - Actions taken as result of occurrence of non-compliance



4 CONCLUDING REMARKS

Operationally, the inspection plan should cover an examination of all potential threats to the environment that the activity under investigation might pose. The report should check the compliance with environmental protection measures and best available techniques. Even if the compliance is evident, the inspector should describe the actions taken for every relevant inspected item. A description of action is important to realise the complexity of the case and it helps with a strategic analysis that should be carried out. The purpose of the strategic analysis is to realise the important issues that affect the environment and reveal potential threats that either the process itself, or personnel bad practice might inflict.

The strategic analysis will provide the inspectors with all material required in order to perform a risk assessment on the issues investigated. A risk rating will help the inspectors realise where the biggest environmental threats exist. Furthermore, the risk assessment defines the amount of data sampling (either pollutants sampling, or documentation sampling) that the inspectors should gather in order to assess the compliance of the operator.

Finally, the time and personnel that should be allocated for the inspection purpose is also defined by the risk assessment. The nature of the environmental threats and the complexity of the installation processes are crucial for the inspection plan, that will be formed ahead or during the inspection procedure.

The following information must be included within the report and followed by relevant verification material.

1. An initial reference to the inspection team and the date and location the team performed its activities
2. Information on the installation's contact information and activity description
3. Description of the weather condition during inspection
4. Inspection on the permits
5. General examination of the installation boundaries
6. Inspection on the condition of the mechanical equipment
7. Health and safety of the working conditions
8. Soil management compliance
9. Water management compliance
10. Air quality management
11. Waste management
12. Hazardous waste management
13. Storage of materials

An **inspection list template that incorporates most of these aspects** is presented in Annex.








5 CITATION

- 1 Step-by-step guidance book for planning of environmental inspection, European Union Network for the Implementation and Enforcement of Environmental Law, IMPEL, November 2008
- 2 OECD Best Practice Principles for Regulatory Policy, Regulatory Enforcement and Inspections, OECD 2004
- 3 Information collection and impact assessment of possible requirements for the environmental inspections in the area of EU legislation on water, nature protection and trade in certain environmentally sensitive goods, Institute for Environmental Studies, July 2013
- 4 Hellenic National Inspection Plan, Inspection body for environment, energy and structures, November 2017

6.1 ANNEX 1: INSPECTION CHECKLIST

Inspection checklist

Inspected by:							
Inspection date:		Time:					
Location/chainage:							
Rain in the last 24hrs (mm)?		Weather conditions (tick one of the following icons):	 <input type="checkbox"/>	 <input type="checkbox"/>	 <input type="checkbox"/>	 <input type="checkbox"/>	 <input type="checkbox"/>

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating ¹				Completion Signoff
	Yes	No		1	2	3	4	
General								
The site is generally in a tidy condition	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All materials and equipment are contained within the project boundary	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All works are undertaken within the project boundary	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Designated haulage routes and access points are being used	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating ¹				Completion Signoff
	Yes	No		1	2	3	4	
Soil and Water Management								
All clean water is being diverted away from disturbed areas	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All clean water diversion drains are stable	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sediment fence is installed correctly and there are no gaps	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Disturbed areas where no works are undertaken are properly covered or stabilised	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Areas of localised soil erosion have been identified and appropriate preventative measures implemented	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There are no areas of potential or actual concentrated flow that do not flow to sediment basins/traps	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Slope lengths are maintained at appropriate lengths to slow flows down and minimise erosion	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Check dams are used within diversion drains where required to slow flows down and minimise erosion within the drains	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Geotextile linings (or similar) are used to provide temporary surface protection in areas where appropriate (e.g. batter drains, culvert construction)	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Stockpiles are sited in low-hazard areas clear of watercourses and flood prone lands	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating ¹				Completion Signoff
	Yes	No		1	2	3	4	
Cut-off drains on the upslope side and sediment fencing on the downslope side are in place for all stockpile areas within the site	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Stockpiles are less than 2m in height	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sediment control measures are constructed as close to the potential source of sediment as possible	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Shakers, rubble pads or wash down areas have been installed	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is no mud on the roads outside of the project boundary	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sediment fencing or equivalent is provided downslope of disturbed areas that can't be directed into a designated sediment basin	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sediment basin volume markers intact and clearly visible	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sediment basin inlets and outlets are stable	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Accumulated sediment is below 30% of the sediment storage zone	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The basins have been emptied since the last rain event and restored to their design capacity (if not, explanation must be provided)	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All discharges are undertaken in accordance with Dewatering Permits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating ¹				Completion Signoff
	Yes	No		1	2	3	4	
Air Quality/Dust Management								
No visible dust leaving the Project boundary	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Dust suppression, i.e. water cart, is being used to minimise dust emissions	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Vegetation Management								
Clearing limits and work boundaries are established and well defined	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Clearing and grubbing works are undertaken in accordance with Clearing and Grubbing Permits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
No materials are stockpiled and no vehicles are parked under trees' drip line	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Exclusion fencing around trees and sensitive areas is intact	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
No visible weed infestation	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heritage Management								
Exclusion fencing around heritage protected areas is intact	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heritage protected areas are adequately signposted	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Environmental Protection Measure	Compliance?		Description of Action (if required)	Action Risk Rating ¹				Completion Signoff
	Yes	No		1	2	3	4	
Waste Management and Storage of Hazardous Materials								
Wastes are segregated in designated containers	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Contaminated soil/asbestos storage areas are fenced off and signposted	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Concrete washouts are properly set-up and signposted	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fuel/chemicals stored in bunded areas	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
No oil leaks or spills visible on site	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Refuelling in designated areas	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Spill kits available in designated areas	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Action Risk Rating

Action Risk Rating	Risk Level	Priority*	Examples
1	Extreme	Immediately - must be closed out on the day of inspection	<ul style="list-style-type: none"> Any actual or potential non-compliance with any EA conditions Adverse weather conditions are predicted that may result in above if controls are not adequate
2	High	Within 24hrs	<ul style="list-style-type: none"> Critical ERSED controls are damaged and need to be reinstated before a rain event
3	Medium	Within 3 Working Days	<ul style="list-style-type: none"> Dewatering of sediment basins required
4	Low	Within 5 Working Days	<ul style="list-style-type: none"> Stockpiles need to be stabilised

* Priority must be reviewed and revised particularly if adverse weather conditions are predicted



6.2 ANNEX 2: TRAINING EVALUATION



EFH-PS-2 & 3

Provide technical assistance for addressing industrial pollution and supporting environmental inspection and inventory for the Olive Oil and the Tanning industries of Palestine

Evaluation Report of the training on addressing industrial pollution from the Olive Oil and Tanning industries of Palestine - Training on environmental inspections (EFH-PS-2 & 3)

Grand Park Hotel, Ramallah, 30-31 January 2019

April 2019

Version	Document Title	Author	Review and Clearance
1	Evaluation Report of the training on addressing industrial pollution from the Olive Oil and Tanning industries of Palestine - Training on environmental inspections	Stavros Vlachos Tiberio Daddi	Michael Scoullas Anis Ismail



THE SWIM AND H2020 SUPPORT MECHANISM PROJECT (2016-2019)

The SWIM and H2020 SM is a Regional Technical Support Program, funded by the European Commission, Directorate General (DG) NEAR (Neighbourhood and Enlargement Negotiations), that includes the following Partner Countries (PCs): Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine, [Syria] and Tunisia. However, in order to ensure the coherence and effectiveness of Union financing or to foster regional co-operation, eligibility of specific actions will be extended to the Western Balkan countries (Albania, Bosnia Herzegovina and Montenegro), Turkey and Mauritania. The Program is funded by the European Neighbourhood Instrument (ENI) South/Environment. It ensures the continuation of EU's regional support to ENP South countries in the fields of water management, marine pollution prevention and adds value to other important EU-funded regional programs in related fields, in particular the SWITCH-Med program, and the Clima South program, as well as to projects under the EU bilateral programming, where environment and water are identified as priority sectors for the EU co-operation. It complements and provides operational partnerships and links with the projects labelled by the Union for the Mediterranean, project preparation facilities in particular MESHIP phase II and with the next phase of the ENPI-SEIS project on environmental information systems, whereas its work plan will be coherent with, and supportive of, the Barcelona Convention and its Mediterranean Action Plan.

The overall objective of the Program is to contribute to reduced marine pollution and a more sustainable use of scarce water resources. The Technical Assistance services are grouped in 6 work packages: WP1. Expert facility, WP2. Peer-to-peer experience sharing and dialogue, WP3. Training activities, WP4. Communication and visibility, WP5. Capitalizing the lessons learnt, good practices and success stories and WP6. Support activities.



Sustainable Water Integrated Management and Horizon 2020 Support Mechanism

This Project is funded by the European Union

Disclaimer:

This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of the SWIM-H2020 SM Project and do not necessarily reflect the views of the European Union.



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1 GENERAL INTRODUCTION

The 2017-2022 National Policy Agenda of Palestine includes provisions for industrial waste: reduce and effectively control pollution and greenhouse gas emissions; expand solid waste management and recycling. At the same time, institutions in Palestine need support and technical assistance in the inspection, inventory processes and enforcement of environmental legislation.

Leather tanning wastewater in Palestine is highly polluted with Cr(III). International environmental standards require that chromium in wastewater should not exceed 5 mg L⁻¹ for Cr(III) and 0.05 mg L⁻¹ for Cr(VI). Meanwhile, the olive oil mill waste water is considered as one of the most polluting waste waters from the food sector and causes great problems in biota and cultivations untreated in soil or aquatic systems. It has a very high COD, i.e. 200 000 mg/l, a low pH, i.e. 3–5.9, and a high content of solid matter, i.e. TSS 20 000 mg/l. In addition, the high polyphenol content of olive mill waste water (OMW), up to 80 000 mg/l, make bacterial degradation very difficult and give them phytotoxic characteristics.

Much like in other regions of the world, the tanneries and olive mills in Palestine contribute to the core problem of surface and groundwater pollution. The wastewater from the different olive mills located in and around the different villages in the West Bank is being disposed into the wadies. The olive mill wastewater is then mixed with the flowing untreated municipal wastewater or with rainwater. The high organic polluted wastewater affects the soil, groundwater and water courses downstream. This occurs mainly during the olive season, generally from early October to late December.

Initially the Work Programme of SWIM-H2020 SM had two different activities, one entitled “Provide technical assistance for addressing industrial pollution focusing on the tanning and olive oil industries” and another on “Support in environmental inspection and enforcement of environmental legislation”. However, a joint decision (of the project and National Horizon 2020 Focal Point) was taken to merge the two activities into one: Provide technical assistance for addressing industrial pollution, supporting environmental inspection and enforcing environmental legislation for the Olive Oil and the Tanning industries in Palestine.

This Report is dedicated to the 2-day training that provided technical assistance to the relevant national and local institutions in enforcing national and international environmental standards and laws, applying Environmental Impact Assessments, and inspection of tanning facilities and olive oil mills. It took place on 30-31 January 2019 in Ramallah.

2. OBJECTIVES and expected results of the workshop

The training aimed to enhance the knowledge of public officials and professionals of tanneries and olive oil mills on how to prevent and reduce pollution from the olive oil and tanning sectors in Palestine. The training’s purpose was the development of guidelines and tools for pollution inspection/control in the mentioned industries in Palestine. To reach its objectives, the approach of the training was practical,



included discussions of practical cases of environmental inspection experiences adopted in the EU in the olive oil and the tanning industries.

As a contribution to pollution reduction from the Olive Oil and Tanning industries in Palestine, the expected results of this training were:

- Development of inspection forms
- Reinforced and developed capacities of inspectors

The experts in charge are convinced that the above results were achieved to a satisfactory degree with room for taking up the suggestions and needs expressed by the trainees in any follow-up action to be considered. The training offered valuable insights to the Experts to be able to develop the inspection guidelines/manual.

3. PARTICIPANTS PROFILE

In accordance with Terms of Reference of this activity, this workshop targeted competent professionals from the two industrial sectors, and technical staff from the Environmental Quality Authority (EQA), Ministry of National Economy (MoNE), Joint Services Council for Solid Waste Management, Ministry of Local Government (MoLG) (Municipalities, Council, etc.), Committees of public health and safety in Governorates, Ministry of Health (MoH), Industries Union, Ministry of Agriculture (MoA) and Palestinian olive oil council.

As seen also from the list of participants (see Annex), the event was attended by 5 professionals from the 2 industrial sectors, 21 from the EQA, 4 from MoA, 4 from MoH, 1 from MoLG, 3 from MoNE, 4 from Palestine Police Department and 1 from Ramallah & Al-Bireh Governorate.

4. EVALUATION OF THE RESULTS (BY TRAINEES)

A. Feedback on organizational, administrative and planning issues of the event

A set of 7 criteria; A1-A7 (see table below) were assessed by the participants, using a qualitative description ranging between “Excellent” to “Poor”, with an opportunity to provide suggestions for improvement. For the sake of comparison, the qualitative descriptions are given series numbers as follows: Excellent = 4; Good = 3; Average = 2; Poor = 1.



Table 1. Training rating results related to organizational, administrative and planning issues

A. ORGANISATIONAL, ADMINISTRATIVE AND PLANNING ISSUES BEFORE AND DURING THE EVENT						Total Replies	Average Score (max = 4)
		EXCELLENT	GOOD	AVERAGE	POOR		
A1	Efficient logistics: location of venue and interpretation	8	8	1	0	17	3.41
A2	Smooth flow of programme, efficient handling of emerging needs and attentiveness to participants concerns	4	10	3	0	17	3.06
A3	Presentations correspond and contribute to the planned objectives and are conducive to enhanced shared understanding and participation on addressed topics	3	11	3	0	17	3
A4	Clarity, coverage and sufficiency of concepts, objectives, anticipated outputs and outcomes	6	10	1	0	17	3.29
A5	The materials distributed were helpful	4	13	0	0	17	3.24
A6	Efficient and effective facilitation	4	13	0	0	17	3.24
A7	Overall rating of the event	3	12	2	0	17	3.06

See also the corresponding graphs for Table 1 in Annex 5.

B. Feedback on technical aspects of the event

Figure 1- Coverage of the event

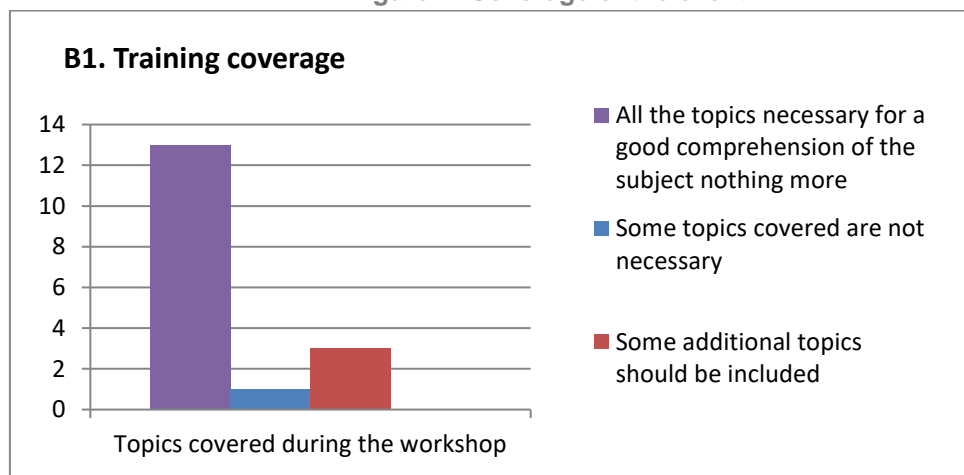




Figure 2 – Level of difficulty

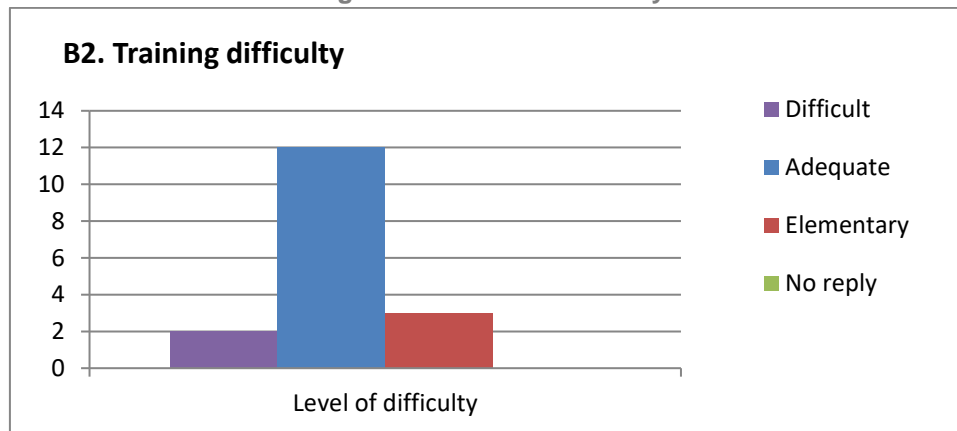
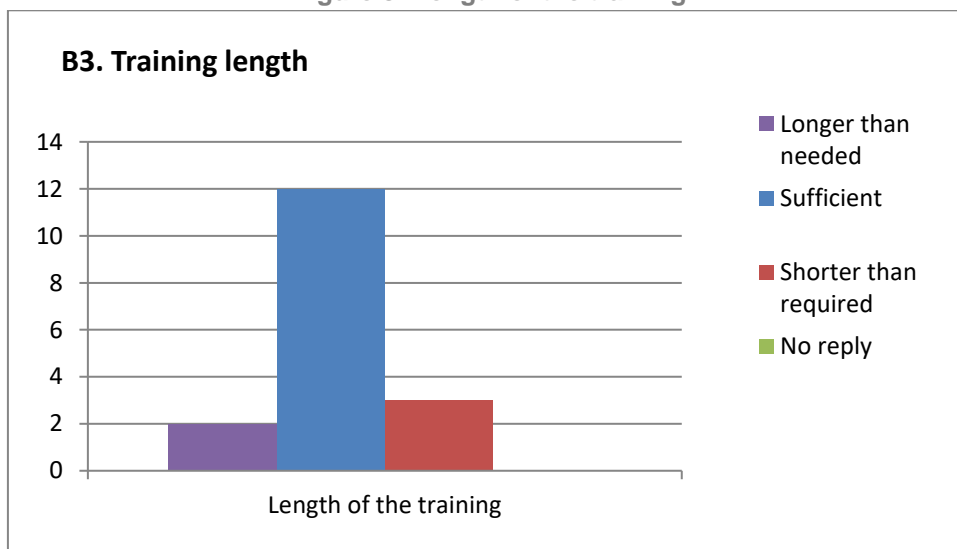


Figure 3- Length of the training



See more details regarding technical aspects in Table 2 in Annex 5.

See the participants' replies to the open-ended questions in Table 3 in Annex 5.



5. ANNEXES

5.1 AGENDA OF THE TRAINING

EFH-PS-2&3

Addressing industrial pollution from the Olive Oil and Tanning industries of Palestine:

Training on environmental inspections

30-31 January 2019

Venue: Grand Park Hotel, Ramallah, Rafat St. Al-Masyoun Heights

30 January		
Session 1 Introduction	<ul style="list-style-type: none"> Welcome addresses, opening remarks Introduction, aims, participants expectations, ice-breaking <p><i>EQA, EUD, Stavros Vlachos and Tiberio Daddi, SWIM-H2020 SM Experts</i></p>	09:00-09:30
Session 2 Plenary	<ul style="list-style-type: none"> Process description on olive mill and tanneries sectors and process and products environmental performance <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i></p>	09:30-10:30
Coffee Break 10.30 - 11.00		
Session 3 Plenary	<ul style="list-style-type: none"> Environmental aspects and best available technologies <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i></p>	11:00-13:00
Lunch Break 13.00 - 14.00		
Session 4 Plenary	<ul style="list-style-type: none"> Real life case studies on inspection issues <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i></p>	14:00-15:00
31 January		
Session 5 Plenary	<ul style="list-style-type: none"> Basic principles of inspection <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i></p>	09.00 - 10.00
Session 6 Plenary	<ul style="list-style-type: none"> Risk assessment, frequency of inspections, allocation of responsibilities <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i></p>	10:00-11:00
Coffee Break 11.00 - 11.30		
Session 7 Plenary	<ul style="list-style-type: none"> Exercise on real cases of inspection preparation and implementation <p><i>Stavros Vlachos, SWIM-H2020 SM Expert</i></p>	11:30-12:30



	<i>Tiberio Daddi, SWIM-H2020 SM Expert</i>	
Session 6 Plenary	<ul style="list-style-type: none">• Closing/Wrap up• Course Evaluation• Certificates Award <i>EQA, Stavros Vlachos, SWIM-H2020 SM Expert</i> <i>Tiberio Daddi, SWIM-H2020 SM Expert</i>	12.30 - 13.00
Lunch 13.00 - 14.00		



5.2 LIST OF PARTICIPANTS OF THE TRAINING

Addressing industrial pollution from the Olive Oil and Tanning industries of Palestine - Training on environmental inspections (EFH-PS-2&3) 30-31 January 2019, Ramallah, Palestine								
No.	COUNTRY	TYPE OF INSTITUTION (please use the options provided*)	TITLE (Mr/Ms)	FIRST NAME	LAST NAME	POSITION/ FUNCTION	ORGANISATION/ INSTITUTION	EMAIL
1	GREECE	INTERNATIONAL ORGANISATIONS AND PROGRAMMES	Mr.	Stavros	VLACHOS	Project Expert	Enviromentrics / SWIM-H2020 SM	svlachos@envirometrics.gr
2	ITALY	INTERNATIONAL ORGANISATIONS AND PROGRAMMES	Mr.	Tiberio	DADDI	Project Expert	SWIM-H2020 SM	tiberio.daddi@santannapisa.it
3	PALESTINE	INTERNATIONAL ORGANISATIONS AND PROGRAMMES	Mr.	Amer	EL-HAMOUZ	Project Expert	SWIM-H2020 SM	elhamouz@yahoo.com
4	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Ahmad	ABUTHAHER	Director General For Projects and International Relations & H2020 focal point	Environment Quality Authority (EQA)	ahmadabuthaher@yahoo.com
5	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Yaser	ABU SHANAB		Environment Quality Authority (EQA)	yaser_shanab@hotmail.com
6	PALESTINE	LOCAL AUTHORITIES	Mr.	Montaser	TAMIMI	Environment police department	Palestine Police Department	tamimiabuhadi@hotmail.com
7	PALESTINE	LOCAL AUTHORITIES	Mr.	Ribhi	HANAYSHIH	Vice Director of Tourist Police	Palestine Police Department	ribhibadad@gmail.com



8	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Ibrahim	ABSA	Minister's office	Environment Quality Authority (EQA)	ibrahim_25_25@yahoo.com
9	PALESTINE	LOCAL AUTHORITIES	Mr.	Hassan	JAMAL	Manager of Tourist Police	Palestine Police Department	montasertamimi11@gmail.com
10	PALESTINE	LOCAL AUTHORITIES	Mr.	Tareq	ABU LIBDEH	Officer	Palestine Police Department	
11	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Zeyad	ABDELRAHMAN	Director of national product industry	Ministry of National Economy (MoNE)	zeiadf@met.gov.ps
12	PALESTINE	PRIVATE SECTOR	Mr.	Marwan	ZATARI	Owner	Hebron Tanning	marawanzat2@gmail.com
13	PALESTINE	PRIVATE SECTOR	Mr.	Abdallah	ZATARI	Manager	Hebron Tanning	azatari@yahoo.com
14	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Thaer	THYAB	Manager	Ministry of Agriculture (MoA)	thaer.thyab@gmail.com
15	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Mohammed	ALASMAR	General Director	Ministry of Agriculture (MoA)	moh0h1977@gmail.com
16	PALESTINE	PRIVATE SECTOR	Mr.	Abed	ALZATARI	Manager & Owner	Hebron Tannery	abhzatari@gmail.com
17	PALESTINE	PRIVATE SECTOR	Mr.	Amer	ZATARI	Manager & Owner of the tannery & official tanneries in official institutions	Hebron Tannery	wztamer@yahoo.com
18	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Ruba	ABDELHADI	Environmental Inspector	Environment Quality Authority (EQA)	rubaarman@hotmail.com



19	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Yosrea	RAMADAN	Environmental Engineer	Ministry of Local Government (MoLG)	swmolg2014@gmail.com
20	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Doaa	ABDALLAH	Environmental Inspector	Environment Quality Authority (EQA)	doaabdallah@hotmail.com
21	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Haneen	ALAKHRAS	Head of environment health department	Environment Quality Authority (EQA)	haneen_rs@hotmail.com
22	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Nadine	YOUSEF	Inspector	Environment Quality Authority (EQA)	nadeenazzam@yahoo.com
23	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Huda	ZAAROUR	Monitoring & Inspection Engineer	Environment Quality Authority (EQA)	hudazaarour@gmail.com
24	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Mohamad	YASIN	Environmental Inspector	Ministry of Health (MoH)	modi@gmail.com
25	PALESTINE	GOVERNMENT AGENCIES	Mr.	Omayma	YOUSEF	Environmental Inspector	Ramallah & Al-Bireh Governorate	omayma.youssef@gmail.com
26	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Ahmad	AL TAMERAH	Food Inspector	Ministry of Health (MoH)	ahmad.altamerah@gmail.com
27	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Wisal	RASLAN	Environmental Inspector	Environment Quality Authority (EQA)	wisal_raslan@hotmail.com
28	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Asma	KALBONAH	Environmental Engineer of Impact Assessment	Environment Quality Authority (EQA)	asma_gasem@yahoo.com
29	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Hiba	MANSOURI	Environmental Inspector	Environment Quality Authority (EQA)	hibam_1985@hotmail.com



30	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Bahjat	JABARIN	Manager of Hebron Office	Environment Quality Authority (EQA)	banjat76@yahoo.com
31	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Marwan	YACOB	Manger of Salfeet Office	Environment Quality Authority (EQA)	marw1973@yahoo.com
32	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Talib	IHMIED	Director of monitoring and inspection	Environment Quality Authority (EQA)	ihmied@gmail.com
33	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Mahmoud	OTHMAN	Manager of waste disposal unit	Ministry of Health (MoH)	mothman11@yahoo.com
34	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Mohammad	AL-BATTAT	Environmental Inspector	Environment Quality Authority (EQA)	
35	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Amjad	KHARRAZ	Manager of Nablus Office	Environment Quality Authority (EQA)	engkharraz@yahoo.com
36	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Hashem	SALAH	Director of Bethlehem Office	Environment Quality Authority (EQA)	hashem_ahs@yahoo.com
37	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Lama	JARRAD	Director of the environmental approval Department	Environment Quality Authority (EQA)	lamajarrad60@yahoo.com
38	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Abdelmunem	SHEHAB	Director of Jenin Office	Environment Quality Authority (EQA)	abedal60y@yahoo.com
39	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Hossam	MOHAMMAD	Head of Olives	Ministry of Agriculture (MoA)	hossam_mosalam@yahoo.com
40	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Suha	ARAR	Director of Food Safety	Ministry of Health (MoH)	suha.arar@gmail.com

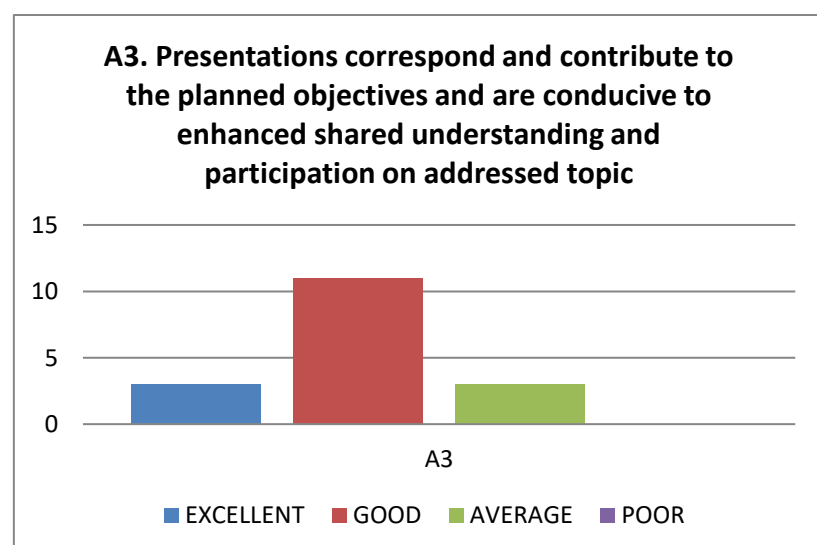
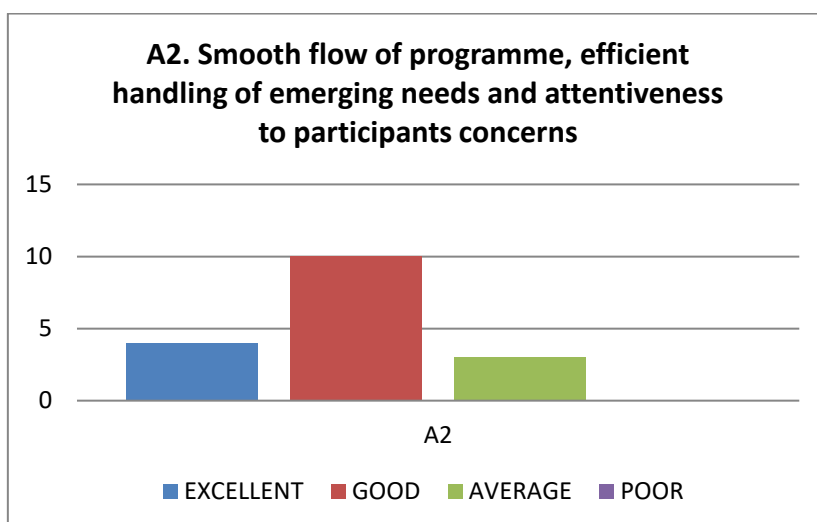
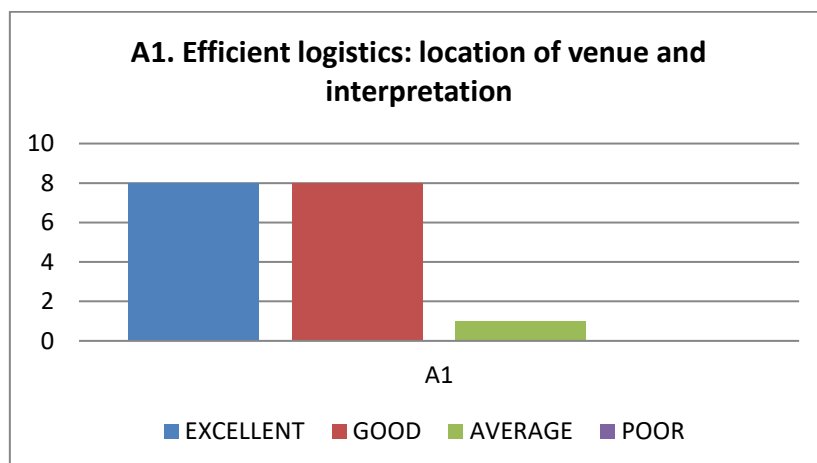


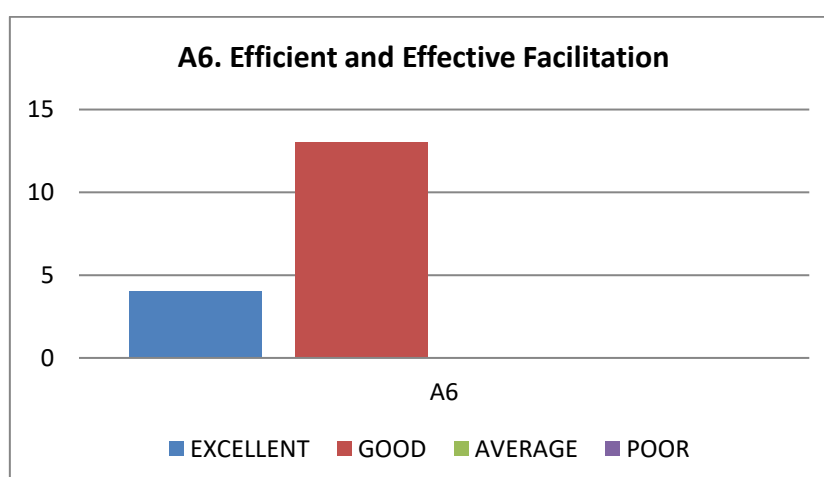
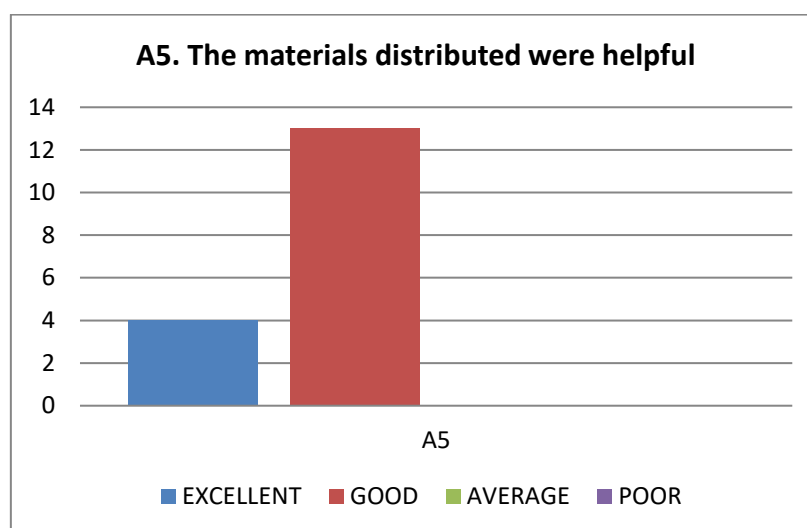
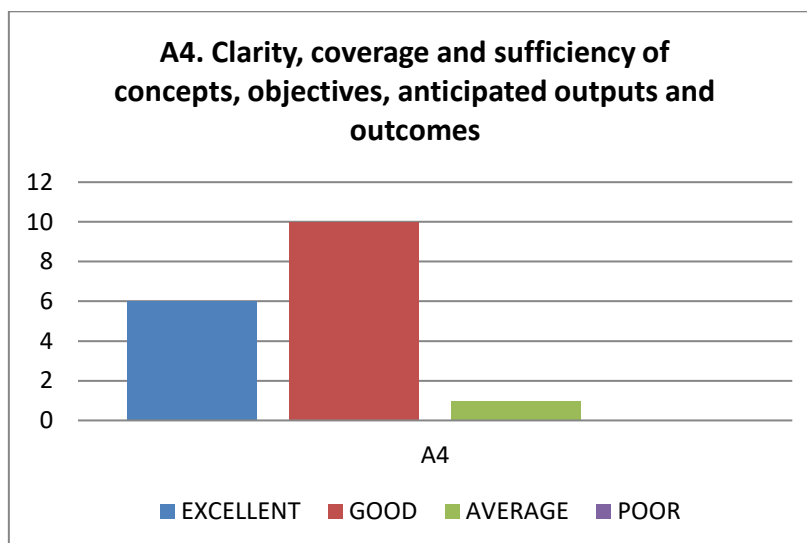
41	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Leen	SANJAQ	Engineer	Environment Quality Authority (EQA)	leenms8@yahoo.com
42	PALESTINE	MINISTRY REPRESENTATIVES	Ms.	Rula	AREM	Environmental Inspector	Environment Quality Authority (EQA)	rulafa@yahoo.com
43	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Moheeb	JABARI	Director of Industry/Hebron	Ministry of National Economy (MoNE)	moheebj@met.gov.ps
44	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Zeyad	ABDELRAHMAN	Director of national product industry	Ministry of National Economy (MoNE)	zeiadf@met.gov.ps
45	PALESTINE	OTHER (including Diplomats, Consultants , Members of Parliament etc)	Mr.	Mohammed	HUSAIN	Cluster manager	Hebron Leather & Shoe Cluster	Mohammed.husain@pal-cluster.ps
46	PALESTINE	MINISTRY REPRESENTATIVES	Mr.	Mohammed	AL DARABEE	Head of Horticulture	Ministry of Agriculture (MoA)	abu_ared@yahoo.com



5.3 DETAILS ON THE RESULTS OF THE EVALUATION FORMS

The following graphs illustrate Table 1: Training rating results related to organizational, administrative and planning issues.





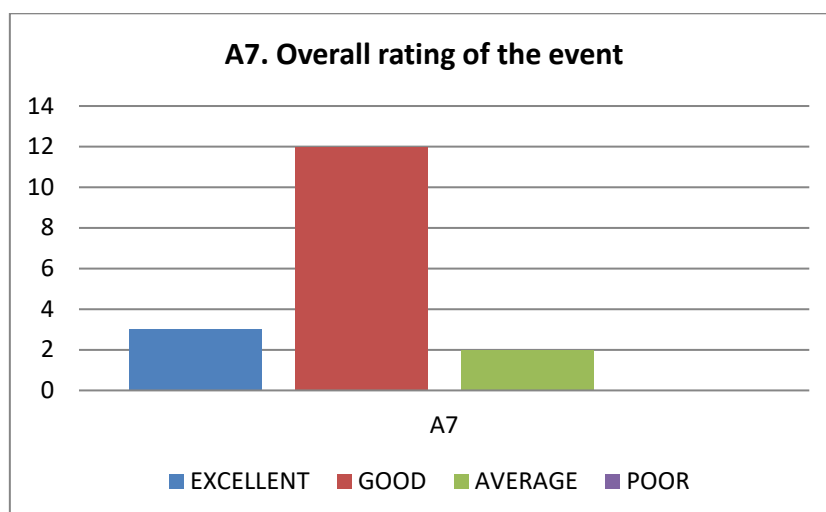


Table 1. Participants' feedback on technical aspects of the event.

FEEDBACK ON TECHNICAL ASPECTS	No. of replies
B1. Coverage of the event	
All the topics necessary for a good comprehension of the subject	13
Some topics covered are not necessary	1
Some additional topics should be included	3
Total Replies	17
B2. Level of difficulty	
Difficult	2
Adequate	12
Elementary	3
Total Replies	17
B3. Length of the training	
Longer than needed	2
Sufficient	12
Shorter than required	3
Total Replies	17

Table 3. Participants replies to the open-ended questions

Open-ended questions	Participant's replies
B4 What is the most valuable thing you learned during the workshop (knowledge or skills)?	<ul style="list-style-type: none"> how Italy and Greece deal with waste and their experience about BAT and tannery factories in Italy about inspection improvement I gained knowledge information about tanneries experience from the industrial sector inspection aspects, inspection planning and forms and local industry's demands inspection procedures about tanning the method used to decide about ranking (risk assessment) the experience of tanning industry in EU how the inspection process is carried out in other countries like Italy



		<ul style="list-style-type: none"> the inspection steps 	
	Total Replies		12
B5	How do you think that the current event will assist you in your future work on the subject?	<ul style="list-style-type: none"> enhance my knowledge (4) improve our field visits and inspections (4) enhance my knowledge about inspection procedures to put priorities according to risk assessment it will help the private sector to solve the industrial problem develop tools to perform more efficient the inspection process 	
	Total Replies		12
B6	Please indicate whether (and how) you could transfer part of the experience gained from the event to your colleagues in your country?	<ul style="list-style-type: none"> meetings with our colleagues (3) yes, in the committees where we participate with other ministries by training by coordinating with public and private sector 	
	Total Replies		6
B7	What did you like most about this event?	<ul style="list-style-type: none"> the discussion management procedures and information about tanning industry the materials are useful and cover many issues the questions that were asked to the trainees information about inspections 	
	Total Replies		5
B8	What needs to be improved?	<ul style="list-style-type: none"> training on the environmental inspection, more information and application (2) to follow up and apply this experience locally have more meetings more practical exercises in general and especially for field visits the presentations capacity building for public and private sector, study visit in EU and expert exchange 	
	Total Replies		7