Crna Gora
Državna revizorska institucija

DRI broj:
Podgorica, 15.10.2021. godine

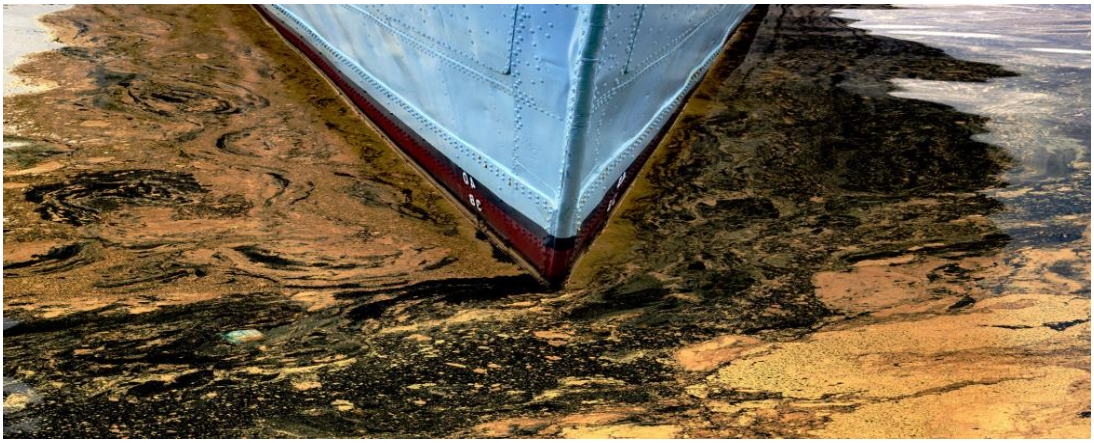
I Z V J E Š T A J

o sprovođenju međunarodne paralelne revizije uspjeha

VRHOVNIH REVIZORSKIH INSTITUCIJA ALBANIJE, BOSNE I HERCEGOVINE, HRVATSKE, ITALIJE, CRNE GORE I SLOVENIJE

UPRAVLJANJE INTERVENCIJAMA U SLUČAJU IZNENADNOG ZAGAĐENJA U JADRANSKOM MORU

Managing intervention in case of sudden pollutio in the Adriatic sea
International parallel audit of the Supreme Audit Institutions of:
Republic of Albania, Bosnia and Herzegovina, Republic of Croatia,
Italian Republic, Montenegro, Republic of Slovenia



Podgorica, oktobar 2021. godine

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1. PRAVNI OSNOV ZA VRŠENJE REVIZIJE

Pravni osnov za vršenje **paralelne revizije efikasnosti** „Upravljanje intervencijama u slučaju iznenadnog zagađenja[1] u Jadranskom moru" sadržan je u:

- Ustavu Crne Gore, član 144 („Sl. list CG" br. 01/07);
- Zakonu o Državnoj revizorskoj instituciji, član 4 („Sl. list RCG" br. 28/04, 27/06, 78/06 i „Sl. list CG" br. 17/07, 73/10, 40/11 i 31/14);
- Godišnjem planu revizija DRI za 2020. godinu (br. 06-357/19 od 30.12.2019. godine) i
- Odluci o vršenju revizije od 30.01.2020. godine (br.4046/20-024-133/2) Kolegijuma u sastavu: dr Branislav Radulović (rukovodilac Kolegijuma) i dr Milan Dabović (član Kolegijuma).

Revizija je sprovedena u skladu sa:

- Poslovnikom Državne revizorske institucije („Sl. list CG" br. 3/15);
- Uputstvom o metodologiji vršenja revizije uspjeha („Sl. list CG", br. 45/17) i
- Međunarodnim standardima za vrhovne revizorske institucije.

U skladu sa čl. 144. Ustava Crne Gore[2], Državna revizorska institucija Crne Gore (DRI) vrši reviziju zakonitosti i uspješnosti upravljanja državnom imovinom i obavezama, budžetima i svim finasijskim poslovima čiji su izvori finansiranja javni ili nastaju korišćenjem državne imovine.

Zakonom o Državnoj revizorskoj instituciji[3], čl. 5. Zakona, Institucija kroz postupak revizije **utvrđuje:**

- **uspješnost** ostvarenja ciljeva poslovanja ili ciljeva pojedinih finansijskih transakcija, programa, projekata, korišćenje ljudskih, finansijskih i drugih resursa subjekata revizije, kao i

- **efekte** ostvarenih ciljeva i rezultata u odnosu na planirane.

Standardi ISSAI 5510 pomažu VRI u davanju preporuka u ovoj oblasti.[4] Revizija smanjenja rizika od katastrofa može obuvatiti aspekte revizije uspjeha, kao i finansijske i revizije pravilnosti.[5]

[1] Zagađenja su neželjene promene fizičkih, hemijskih i bioloških svojstava životne sredine (vazduha, vode i zemljišta), koje mogu nepovoljno djelovati na živa bića ili narušiti njihove ekosisteme.
[2] "Sl. list CG", br. 38/13
[3] "Sl. list RCG", br. 028/04, 027/06, 078/06, Sl. list CG", br. 017/07, 073/10, 040/11, 031/14
[4] https://www.environmental-auditing.org/media/5767/issai-5510-e.pdf
[5] Opšte smjernice za reviziju finansijske revizije ISSAIs 1000-1810, Opšte smjernice za reviziju revizije performansi ISSAIs 3000-3100, Opšte smernice za reviziju revizije usklađenosti ISSAIs 4000-4200

2. PREDMET, OBUHVAT I VRSTA REVIZIJE

Predmet revizije: Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru.

Obuhvat revizije: U postupku vršenja revizije izvršen je pregled regulative i dokumentacije koja se odnosi na aktivnosti nadležnih institucija, načela rada i djelovanja, zadatke i dužnosti, mjere i postupke za sprečavanje, smanjenje i otklanjanje posledica iznenadnog zagađenja Jadranskog mora, sa kojom raspolažu subjekti revizije, a koja se odnosi na period od 4 godine (2017, 2018, 2019 i 2020 godina).

Svrha: Prikazivanje nacionalnog odgovora zaštite Jadranskog mora od iznenadnog zagađenja zagađenja i identifikovanje nedostataka i problema u funkcionisanju procesa.

Vrsta revizije: Paralelna revizija uspjeha.

Reviziju su **sprovele vrhovne revizorske institucije** (VRI):

- Državna vrhovna revizija Republike Albanije,
- Ured za reviziju institucija Bosne i Hercegovine,
- Ured za reviziju institucija u Federaciji Bosne i Hercegovine,
- Državni ured za reviziju Republike Hrvatske,
- Corte dei conti Italijanske Republike,
- Državna revizorska institucija Crne Gore i
- Revizijski sud Republike Slovenije,

koje su u periodu od novembra 2019. do juna 2021. godine izvršili paralelnu reviziju uspjeha „Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru."

Paralelna revizija je izvršena u skladu sa principima Vodiča ISSAI 5800 o paralelnim revizijama, INTOSAI standardima i primjerima za paralelne revizije, ISSAI 3000 i drugim odgovarajućim revizorskim standardima i smjernicama.

Inicijator vršenja predmetne paralelne revizije uspjeha je bio Državni ured za reviziju Republike Hrvatske, a okupio je sedam revizorskih institucija javnog sektora iz šest zemalja radi ispitivanja efikasnosti vlada u sprečavanju i upravljanju sistemima odgovora u slučaju iznenadnog zagađenja u Jadranskom moru.

Zajednička aktivnost revezorskih timova započela je 2019. godine u Rijeci (Republika Hrvatska), kada su i utvrđene:

- karakteristike paralelne revizije i
- pristup koji su izabrale VRI, kako bi se postigli konačni rezultati i dodata vrijednost koja proizilazi iz same paralelne revizije.

Na bazi sprovedene nacionalne revizije, utvrđenog činjeničnog stanja i izjašnjenja subjekata revizije na preliminarni izvještaj, a u skladu sa čl. 44 Zakona o Državnoj revizorskoj insituciji i čl. 45 Poslovnika Državne revizorske institucije, nadležni Kolegijum DRI u sastavu: dr Branislav Radulović (rukovodilac Kolegijuma) i dr Milan Dabović (član Kolegijuma), na sjednici Kolegijuma DRI održanoj 27.04.2021. godine usvojio je **Konačni izvještaj o reviziji efikasnosti „Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru"** dana 27.04.2021. godine (DRI broj: 02-035/21-622/22.) koji je bio osnova za izradu izvoda koji je postao integralni **dio zajedničkog kompendijuma** 6 VRI.

Revizija je bila usmjerena na postupke koje institucije i organi Crne Gore preduzimaju u cilju sprovođenja mjera u slučaju iznenadnog zagađenja Jadranskog mora, i obuhvatila je slučajeve iznenadnog zagađenja mora koji se se desili u periodu od 2017-2020. godine.

Sprovedenom revizijom ispitano je:

- da li se ratifikovane međunarodne konvencije i nacionalno zakonodavstvo koje tretira ovu oblast implementira u praksi,
- da li institucije CG prilikom njihovog sprovođenja nailaze na poteškoće;
- da li su identifikovani nedostaci, koje nove strateške i operativne akte je potrebno donijeti, te da li su postojeći bili predmet ažuriranja.

Reviziju je sproveo revizorski tim u sastavu: Blažo Savković – državni revizor, načelnik u sektoru i Jadranka Delibašić – državni revizor, rukovodilac odjeljenja za razvoj i vršenje revizije uspjeha

Vrhovna državna revizija Crne Gore je:

- na osnovu sprovodene revizije uspjeha i utvrđenog činjeničnog stanja **identifikovala probleme i slabosti koji ograničavaju uspješnost sistema zaštite Jadranskog mora od iznenadnog zagađenja i**

- **ocijenila da Crna Gora ima ograničene kapacitete za zaštitu mora od iznenadnih zagađenja.**

Predmetnom revizijom je utvrđeno da nakon devet (9) godina od izrade Nacionalnog akcionog plana za hitno reagovanje u slučaju zagađivanja mora sa plovnih objekata **nije:**

- uspostavljen adekvatan sistem za reagovanje na iznenadno zagađenje većeg obima (nivo 3) u dijelu zadovoljavjućih materijalno-tehničkih i kadrovskih resursa, izrade mapa osljetljivih područja, konstantne procjene rizika i dugih pitanja od značaja za adekvatan odgovor;

- došlo do usvajanja revidiranog Nacionalnog plana za hitno reagovanje u slučaju zagađivanja mora sa plovnih objekata iz 2011 godine;

- uspostavljena odgovarajuća koordinacija između svih učesnika koji imaju ulogu u Nacionalnom planu;

- potpisan nijedan regionalni sporazum za zajedničku reakciju;
- došlo do ratifikovanja neophodnih konvencija i nijesu ispunjene sve obaveze iz već ratifikovanih.

DRI je u svom izvještaju[6] ukazala da:

- nijesu realizovane sve aktivnosti, preporuke i sve mjere zaštite životne sredine iz Izvještaja o strateškoj procjeni uticaja Programa istraživanja i proizvodnje ugljovodonika u podmorju Crne Gore na životnu sredinu.

Direktiva 2013/30/EU o sigurnosti naftnih i plinskih djelatnosti na moru još uvijek **nije implementirana** u crnogorsko zakonodavstvo iz razloga što nije donijet Zakon o mjerama sigurnosti prilikom istraživanja i proizvodnje ugljovodonika u podmorju.

Shodno navedenom vrhovna državna revizija Crne Gore **ocjenjila je da:**

- postojeći sistem zaštite od iznenadnog zagađenja mora **nije dovoljno efikasan**, te da su potrebne dodatne i djelotvornije mjere radi unapređenja istog.

Na osnovu iznesenih nalaza i zaključaka, **u cilju eliminisanja revizijom evidentiranih nepravilnosti, propusta i nedostataka** i uspostavljanja efikasnog sistema, kako bi se umanjili štetni efekti na Jadransko more, vrhovna državna revizija (DRI) je u okviru **konačnog izvještaja DRI**[7] dala 34 preporuke za 6 subjekata revizije i jedinice lokalne samouprave.

[6] Strana 73 Konačnog izvještaja o reviziji efikasnosti „Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru" od 27.04.2021. godine (DRI broj: 02-035/21-622/22.)
[7] Konačni izvještaj o reviziji efikasnosti „Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru"
http://www.dri.co.me/1/doc/Izvještaj%20o%20reviziji%20uspjeha%20„Upravljanje%20intervencijama%20u%20slučaju%20iznenadnog%20zagađenja%20u%20Jadranskom%20moru".pdf

3. REZIME

Agendom Ujedinjenih nacija za održivi razvoj do 2030. godine[8] ustavnovljen je pristup utemeljen na ekosistemima koji je ključan za cilj održivog razvoja br. 14. „Održivim upravljanjem čuvati okeane, mora i morske resurse".

Na nivou morskog bazena, u kombinaciji s Direktivom, bliska regionalna saradnja država članica u okviru relevantnih regionalnih konvencija o moru pridonosi koordinaciji regionalnog sprovođenja i procjene ciljeva održivog razvoja povezanih s morem. Krajnji je cilj da EU napreduje prema usklađenijoj i troškovno učinkovitijoj zaštiti životne sredine mora.[9]

Činjenica je da zgađenje u jednom regionu može uticati na drugi dio svijeta. Međunarodna zajednica je uspostavila međunarodne sporazume za rješavanje ovih globalnih pitanja. Vlade imaju važnu ulogu u zaštiti životne sredine, kroz donošenje odgovarajućih zakona i postavljanjem programa za zaštitu životne sredine.

Evidentno je da Vrhovne revoizorske institucije (VRI) imaju veoma značajnu ulogu u zaštiti životne sredine, pomažući zakonodavnim tijelima da drže vlade svojih zemalja odgovornim za obaveze vezane za zaštitu životne sredine koje su preuzete međunarodnim sporazumima, kao i domaćim zakonodavstvom i programima. Kooperativne revizije su korisne za VRI, posebno kada su u pitanju revizije životne sredine prekograničnih pitanja i one koje se odnose na međunarodne sporazume.

Kooperativne revizije (paralelne) VRI doprinose:

- razmijeni informacija,
- unapređenju znanja revizora,
- izgradnji kapaciteta, i
- umrežavanju.

VRI takođe mogu uporediti nalaze i rezultate revizije sa drugim zemljama (benčmarking), što revizorski izveštaj čini moćnijim. Benčmarking je posebno koristan za skupštinu, koja kroz ovakve izvještaje može izvršiti poređenje sa drugim zemljama.[10] Kako se zabrinutost zbog stanja na našoj planeti povećava, VRI vrše sve više revizija životne sredine i mogu igrati važnu ulogu u tome da njihova vlada preuzme odgovornost za preuzete obaveze.

Kroz realizaciju predmetne revizije ukazali smo na važnost regionalne saradnje, svjesni činjenice da ne postoji način da se očuvaju sopstveni interesi bez uvažavanja interesa susjednih zemalja. DRI smatra da se kroz kontinuriani dijalog i multilateralnu saradnju, može obezbijediti i osigurati dalji razvoj institucionalnih potencijala utemeljenih na evropskim vrijednostima.

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[8] Transforming our world: the 2030 Agenda for Sustainable Development (Promijeniti svijet: program održivog razvoja do 2030.)

[9] Izvještaj komisije evropskom parlamentu i vijeću o sprovođenju Okvirne direktive o pomorskoj strategiji (Direktiva 2008/56/EZ), Bruxelles, 25.6.2020. COM(2020) 259 final eng - Report from the commission to the european parliament and the council on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC)

[10]State of Environmental Auditing in the SAI Community: Highlights from the Fifth Survey on Environmental Auditing INTOSAI—Working Group on Environmental Auditing

Zajedničkim djelovanjem Vrhovnih revizorskih institucija kroz realizaciju ovakvih revizija, doprinosimo unapređenju zaštite životne sredine kao i ekonomskog, društvenog i sveukupnog kvaliteta života naših građana.

Na osnovu iznesenih nalaza i zaključaka, kako bi se umanjili štetni efekti na Jadransko more, VRI su dale preporuke koje će sigurno dovesti do osiguranja konkretne koordinacije među institucijama i tijelima nadležnim za upravljanje obalnim i morskim područjem, nadogradnjom postojećih struktura upravljanja radi bolje integracije i saradnje, povećanjem uključivanja zainteresovanih strana i jačanjem veza između aktera i ključnih institucija.

Ukazujemo da je i cilj **Okvirne direktive o morskoj strategiji Evropske unije** (Marine Strategy Framework Directive)[11] efikasnija zaštita morskog okruženja.[12] U Direktivi se zahtijeva regionalna koordinacija među državama članicama EU i podstiče saradnja s trećim zemljama.[13] Zbog prekogranične prirode mora, određenim pritiscima i ekosastavima je vrlo teško upravljati isključivo na nivou država EU. Vijeće za opšte poslove naglasilo je da je međusobna saradnja država članica i regija koje dijele morski bazen, te po potrebi saradnja s trećim zemljama, ključni element uspjeha Direktive.[14]

U Direktivi se navodi da Regionalna konvencija o moru[15] može činiti temelj za takvu saradnju. Regionalne konvencije o moru u većini slučajeva su dobra platforma za sprovođenje zajedničke strategije za sprovođenje Direktive i podupiru saradnju i dogovor s trećim zemljama u pogledu djelovanja i ciljeva, a pored toga bi primile znatna tehnička i finansijska sredstva od EU-a za razvoj svojih programa rada. Važno je istaknuti da te konvencije integrišu i mjere susjednih zemalja (koje nisu članice EU-a) i pridonose izgradnji kapaciteta.

[11] Direktiva 2008/56/EZ Evropskog parlamenta i Vijeća iz 2008. o uspostavljanju okvira za djelovanje EU u području politike morskog okruženja (Okvirna direktiva o pomorskoj strategiji) (SL L 164, 25.6.2008., str. 19.).

[12] Komisija je takođe izradila set detaljnih kriterijuma i metodoloških standarda kako bi pomogla državama članicama da primjene Okvirnu direktivu o morskoj strategiji. Oni su revidirani 2017. godine dovodeći do nove Odluke Komisije o dobrom stanju životne sredine.

[13]Konačna dogovorena karta morskih regija i podregija iz Direktive dostupna je na https://www.eea.europa.eu/data-and-maps/data/europe-seas#tab-gis-data

[14] 2973. sastanak Vijeća za opšte poslove, Bruxelles, 2009., i sastanak Vijeća za životnu sredinu, Bruxelles, 2009).

[15] Konvencija o zaštiti morskog okruženja i obalnog područja Sredozemlja (Barselonska konvencija – UNEP-MAP)

4. ZAJEDNIČKA IZJAVA

Delegacija Državne revizorske institucije Crne Gore, na poziv i u organizaciji Vrhovne revizijske institucije Republike Italije (Corte dei Conti), učestvovala je na međunarodnoj konferenciji predsjednika/generalnih revizora vrhovnih institucija za reviziju iz Albanije, Bosne i Hercegovine, Hrvatske, Crne Gore, Italije i Slovenije, koje su participirale u projektu paralelne revizije uspjeha na predmetnu temu. Konferencija je upriličena u Trstu, Italija, u periodu 22.-23. septembra 2021. godine.

Konferencija šest vrhovnih revizorskih insitucija zaključena je potpisivanjem **Zajedničke izjave** koja je sastavni dio Kompendija, odnosno izvještaja u kojem su prezentirani sažeci pojedinačnih izvještaja revizije uspjeha na temu upravljanja intervencijama u slučaju iznenadnog zagađenja Jadranskog mora koje su vrhovne revizorske institucije učesnice u projektu sprovele i objavile u skladu sa svojim zakonskim nadležnostima.

Predsjednici Vrhovnih revizorskih institucija iz Albanije, Bosne i Hercegovine, Hrvatske, Italije, Crne Gore i Slovenije potpisali su zajedničko saopštenje proizašlo iz sedam nacionalnih revizorskih izvještaja o upravljanju intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru:

- Nakon sprovedenih revizija, VRI su se složile u pogledu hitnosti mjera koje Vlade predmetnih zemalja moraju da usvoje a koje su usmjerene **na jačanje prevencije** i upravljanja sistemima za odgovor na iznenadno zagađenje mora slučajnim izlivanjem ugljovodonika i drugih opasnih i štetnih materija koje se najčešće transportuju Jadranskim morem.

- VRI takođe smatraju da ekološki rizik i opasnost po životnu sredinu povezan sa iznenadnom ozbiljnom pomorskom nesrećom zahtjeva **hitnu prekograničnu saradnju** kako bi se upravljanje vanrednim situacijama sprovelo usvajanjem zajedničkog plana za reagovanje u hitnim slučajevima za sve države koje izlaze na Jadransko more i organizacijom zajedničkih programa vježbi.

- U cilju jačanja saradnje u zaštiti Jadranskog mora - kao zajedničkog prirodnog nasleđa Albanije, Bosne i Hercegovine, Hrvatske, Italije, Crne Gore i Slovenije - zajednički apel VRI se takođe odnosi na **neophodnost uspostavljanja stalnog Odbora ili Platforme za stručnu saradnju** za razmjenu informacija i iskustva, širenje i prenos dobrih praksi, kao i za razvoj zajedničkih ekoloških projekata usmjerenih na prevenciju, sprečavanje i upravljanje odgovorima u slučaju zagađenja mora.

Zahvaljujući zajedničkom znanju, proširenju vizije i predlozima za vlade i nacionalne parlamente, u okviru međunarodne saradnje učesnici konferencije su se složili da nastave saradnju u cilju praćenja implementacije preporuka datih u paralelnim izvještajima o reviziji uspjeha. Takođe su naglasili prednosti koordinisanih revizija izražavajući spremnost za nastavak zajedničke saradnje u budućnosti.

5. ZAKLJUČAK I PREPORUKA

Na bazi nacionalnog izvještaja Državne revizorske insitucije Crne Gore - Konačni izvještaj o reviziji efikasnosti „Upravljanje intervencijama u slučaju iznenadnog zagađenja u Jadranskom moru" od 27.04.2021. godine (DRI broj: 02-035/21-622/22.) i paralelne revizije koju su sprovele:

Državna vrhovna revizija Republike Albanije,
Ured za reviziju institucija Bosne i Hercegovine,
Ured za reviziju institucija u Federaciji Bosne i Hercegovine,
Državni ured za reviziju Republike Hrvatske,
Računski sud Italije,
Državna revizorska institucija Crne Gore i
Revizorski sud Republike Slovenije,

a u skladu sa čl. 44 Zakona o Državnoj revizorskoj instituciji i čl. 25 Poslovnika Državne revizorske institucije, nadležni Kolegijum DRI u sastavu: dr Branislav Radulović (Rukovodilac Kolegijuma) i dr Milan Dabović (član Kolegijuma), na sjednici Kolegijuma DRI održanoj 15.10.2021. godine usvojio je:

I Z V J E Š T A J

o sprovodjenju međunarodne paralelne revizije uspjeha

"UPRAVLJANJE INTERVENCIJAMA U SLUČAJU IZNENADNOG ZAGAĐENJA U JADRANSKOM MORU"

U skladu sa zajedničkom izjavom vrhovnih revizorskih institucija koje su sprovele paralelnu reviziju uspjeha i **u cilju jačanja prevencije i upravljanja sistemom** za odgovor na iznenadno zagađenje mora, Državna revizorska institucija Crne Gore ukazuje da ekološki rizik i opasnost po životnu sredinu povezan sa iznenadnom ozbiljnom pomorskom nesrećom **zahtijeva institucionalnu prekograničnu saradnju**.

Na osnovu navedenog nadležni Kolegijum DRI **preporučuje:**

- **Vladi Crne Gore** da, u cilju jačanja saradnje u zaštiti Jadranskog mora - kao zajedničkog prirodnog nasleđa Albanije, Bosne i Hercegovine, Hrvatske, Italije, Crne Gore i Slovenije, **preduzme aktivnosti na uspostavljanju stalnog Odbora ili Platforme za stručnu saradnju** za razmjenu informacija i iskustva, širenje i prenos dobrih praksi, kao i za razvoj zajedničkih ekoloških projekata usmjerenih na prevenciju, sprečavanje i upravljanje odgovorima u slučaju zagađenja mora.

Nadležni Kolegijum DRI utvrdio je da karakter nalaza u predmetnoj revizije nalaže da se Izvještaj o paralelnoj reviziji dostavi:

- Predsjedniku Vlade Crne Gore

- Ministarstvu kapitalnih investicija
- Ministarstvu ekologije, prostornog planiranja i urbanizma
- Ministarstvu vanjskih poslova

- Odboru za turizam, poljoprivredu, ekologiju i prostorno planiranje Skupštine Crne Gore.

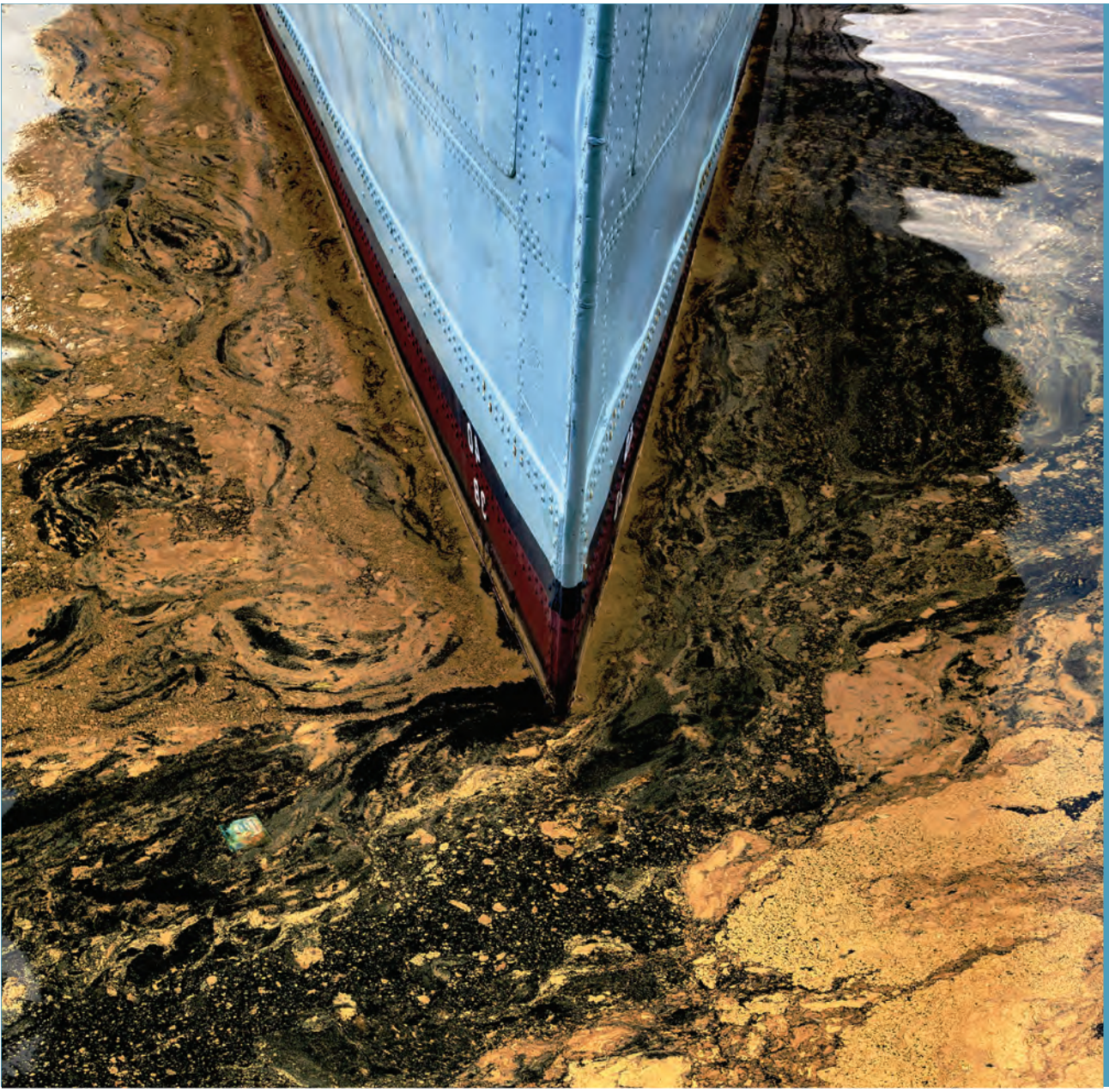
U prilogu: Kompendijum – Zajednički izvještaj

Podgorica, 15.10.2021. godine

Rukovodilac Kolegijuma DRI
dr Branislav Radulović
Senator DRI

Managing interventions in case of sudden pollution in the Adriatic sea

International parallel audit of the Supreme Audit Institutions from Republic of Albania, Bosnia and Herzegovina, Republic of Croatia, Italian Republic, Montenegro, Republic of Slovenia



The following Mediterranean Supreme Audit Institutions (SAIs):

- State Supreme Audit of the Republic of Albania,
- Audit Office of the Institutions of Bosnia and Herzegovina,
- Audit Office of the Institutions in the Federation of Bosnia and Herzegovina,
- State Audit Office of the Republic of Croatia,
- Corte dei conti of the Italian Republic,
- State Audit Institution of Montenegro and
- Court of Audit of the Republic of Slovenia

have in the period from November 2019 until June 2021 carried out performance audit on"managing interventions in case of sudden pollution in the Adriatic Sea."

Parallel audit was performed in accordance with the principles of ISSAI 5800 Guide on Cooperative Audits, INTOSAI Tips and Examples for Cooperative Audits, ISSAI 3000 and other respective audit standards and guidelines.

This document is a compendium of short summaries of individual audit reports published by contributing SAIs. Full audit reports and other materials of each individual SAI can be found by following the links provided after each short summary.

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Joint statement

Conference of the Heads of the Supreme Audit Institutions from Albania, Bosnia and Herzegovina, Croatia, Italy, Montenegro and Slovenia on "Managing interventions in case of sudden pollution in the Adriatic Sea" – Trieste, September 23rd 2021

The SAIs from Albania, Bosnia and Herzegovina, Croatia, Italy, Montenegro and Slovenia, following the audits carried out, agree on the urgency that the respective Governments adopt measures aimed at strengthening prevention and management response systems for marine pollution caused by sudden and accidental spills of hydrocarbons and other hazardous and noxious substances most frequently transported in the Adriatic Sea.

The SAIs also believe that the environmental risk associated with the occurrence of serious maritime accidents requires cross-border cooperation for emergency management, to be implemented through the adoption of a common emergency response plan for all the States bordering the Adriatic Sea and the organisation of joint exercise programs.

With a view to enhance the cooperation for the protection of the Adriatic Sea – as a common natural heritage among Albania, Bosnia and Herzegovina, Croatia, Italy, Montenegro and Slovenia – the SAIs hope for the establishment of a permanent Committee or an expert cooperation platform for the exchange of information and experiences, dissemination and transfer of good practices as well as for the development of common environmental projects focused on prevention and management response to marine pollution.

Dr. Arben Shehu

Chairman of the State Supreme Audit of the Republic of Albania

Hrvoje Tvrtković

Auditor General of the Audit Office of the Institutions of Bosnia and Herzegovina

Dževad Nekić

Auditor General of the Audit Office of the Institutions in the Federation of Bosnia and Herzegovina

Ivan Klešić

Auditor General of the State Audit Office of the Republic of Croatia

Guido Carlino

President of the Corte dei conti of the Italian Republic

Dr. Milan Dabović

President of Senate of the State Audit Institution of Montenegro

Tomaž Vesel

President of the Court of Audit of the Republic of Slovenia



State Supreme Audit of the Republic of Albania



The Albanian State Supreme Audit Institution carried out the national audit reviewing whether the management of the intervention system, in case of sudden pollution in the Adriatic Sea in the period from 1st January 2017 to 30th of April 2020, was effective and efficient. This engagement was part of a parallel audit involving Supreme Audit Institutions of all countries along the Adriatic coast.[1]

The national audit, based on the Audit Program, reviewed the measures taken by the Ministry of Defence and its subordinate the National Agency of Civil Protection, the Ministry of Infrastructure and Energy and its subordinates the General Maritime Directorate, and the Ministry of Tourism and Environment and its subordinate the National Environmental Agency. It was focused in the ports of Durrës, Shëngjin and Vlora, as they lay along the Adriatic coast.

Albania has a 476 km coastline from which 325 km in Adriatic Sea. The Adriatic Sea is of a great geographical and economic importance for Albanian country. It mitigates the climate, a large amount of fish is caught in these waters and salt is extracted off the lagoons. Adriatic Sea also enables the connection between Albania and other countries. Albania's marine ecosystems and coastal wetlands are rich in habitat typology and associated biodiversity. They constitute an important part of the natural heritage not only for the country but also for the Mediterranean region as a whole.

In our country, during the audit period, has been no seas' sudden pollution, of such magnitude to be classified as an environmental emergency, but the increase in trading activities and environmental factors that are negatively impacting the global and regional climate, can lead to environmental disasters, the amplitude of which can be multiplied.

The Albanian State Supreme Audit Institution found out that despite the reforms undertaken by the government, the management and protection system of the seas has shortcomings. The strategic document that sets out policies, objectives, activities and monitoring systems to reduce sea disaster risks, such as sudden pollution, till the end of the audit (December 2020) was not yet drafted. Thus, there

1 The audit focus of the Albanian national audit was broader, including Ionian Sea as well, but for the purpose of this joint indicative, only the summery on Adriatic Sea is presented.

is no strategic framework which guides the prevention, preparation, dealing and recovering from sea disasters through an integrated and efficient system, in order to guarantee the protection of flora and fauna, property, cultural heritage and the environment, in case of sudden pollution.

The new law on civil protection was approved in 2019. Till the end of the audit, the new institutions foreseen by the new Law were not fully operative. Lack of fully established directories and their respective sectors, lack of sufficient number of employees and identified issues with internal organization of this new institutions, risk the effective and efficient management in case of sea sudden pollution.

National emergency response plan has not been updated in accordance with requirements of the new law on civil protection. On the other side, action plans suffer from lack of implementation mechanisms therefore resulting in insufficient controlling mechanisms for the implementation of protective and preventive measures in case of sudden pollution. The regions have not enabled the process of reviewing the emergency plans.

The audit concluded there was poor organization of inter-ministerial monitoring groups, as well as poor cooperation between central institutions with local government bodies in managing the civil emergency system. There have been shortcomings in measures to be taken to clearly define the area of responsibility for emergencies and civil protection according to the type of activity and areas covered by the ministries, following the recent changes that occurred with the approval of the new law.

The national data system on civil emergencies was not fully functional and lacking monitoring activities. As well, the regions did not have data related to the pollution of the sea by oil, hazardous waste, etc., or ways of intervention in these cases for the contaminated areas at sea.

Deficiencies were found in the control mechanisms for material and financial resources, allocated from the state budget to central and local bodies, used for cases of civil emergencies. The auditees, did not have reports, analysis and control information on the use of material and financial resources, which were allocated from the state budget, in cases of emergencies and civil protection. The regions did not have the financial resources and reserves needed in cases of civil protection emergencies and pollution of the sea by oil or hazardous substances.

Not enough controls and inspections were conducted on the implementation of protective and preventive measures in cases of emergencies and civil protection, therefore not addressing lack of promptly and timely actions to control and stop fuel leaks and the release of hazardous chemicals. There were found deficiencies in ensuring a minimum level of tools/equipment ready to be used in response to marine pollution with oil or hazardous substances, difficulties in identifying areas with high risk of accidents and inability to receive information in time and be present with a 24-hour service by vehicles throughout the Albanian maritime space. On the other side, the process of taking measures, by the regions of Shkodër, Lezhë, Durrës, Fier and Vlorë, to protect the sea from pollution, has started lately.

Capacity building has lagged due to different sectoral approaches and insufficient engagement of state institutions. No data on the design, development and implementation of training curricula in the field of emergencies and civil protection, were found. The regions did not have the necessary trained staff to carry out the organization and coordination of activities in cases of civil protection emergencies and sudden pollution of the sea.

Based on the national audit, the State Supreme Audit of Albania concluded that the system of intervening in case of sea pollution was partially effective and efficient. Special attention should be paid in providing the necessary resources to prevent, deal and recover from sea pollution and accidental spills of hydrocarbons and other hazardous and noxious substances. The cooperation between all stakeholders is of most importance for dealing successfully in case of sea pollution.

Full audit report:

https://www.klsh.org.al/content_pdf/176

URED ZA REVIZIJU INSTITUCIJA BIH
КАНЦЕЛАРИЈА ЗА РЕВИЗИЈУ ИНСТИТУЦИЈА БИХ
AUDIT OFFICE OF THE INSTITUTIONS OF BOSNIA AND HERZEGOVINA

AUDIT OFFICE OF THE INSTITUTIONS IN THE
FEDERATION OF BOSNIA AND HERZEGOVINA



Audit Office of the Institutions of Bosnia and Herzegovina and Audit Office of the Institutions in the Federation of Bosnia and Herzegovina



Two public sector auditing institutions from Bosnia and Herzegovina took part in the project of parallel performance audit. Each of these two audit institutions is responsible for public sector auditing within their scope of mandate/competencies and reports to their respective parliament.

The Audit Office of the Institutions of Bosnia and Herzegovina (SAI B&H) is responsible for auditing public institutions and bodies at the state level and reports to the Parliamentary Assembly of Bosnia and Herzegovina. The Audit Office of the Institutions in the Federation of Bosnia and Herzegovina (SAI FB&H) is responsible for auditing public institutions and bodies in the entity of the Federation of Bosnia and Herzegovina (FB&H) including public bodies at the level of the entity, cantons and municipalities within the entity of FB&H. The SAI FB&H reports to the Parliament of FB&H.

The coastline of B&H is located in the FB&H entity.[1] While international cooperation and coordination in the field of environment, maritime transport as well as civil protection fall under the competency of the state-level institutions (B&H), environmental and water protection are within the scope of competence of several federal, cantonal and local government institutions (FB&H). Summaries of performance audit reports conducted by the two audit institutions are presented in the following sections of the report in two separate subchapters.

1 B&H consists of two entities, the Federation of Bosnia and Herzegovina and Republic of Srpska, and the Brcko District.

Audit Office of the Institutions of Bosnia and Herzegovina

The Audit Office of the Institutions of Bosnia and Herzegovina (SAI B&H) conducted a performance audit in order to examine whether the Institutions of Bosnia and Herzegovina have created the preconditions to efficiently response in the event of accidental sea pollution. The audit was also aimed to contribute to the implementation of Sustainable Development Goals, the Goal 14 in particular: Conserve and sustainably use the oceans, seas and marine resources for sustainable development.

Setting up the response system in accordance with the requirements arising from B&H's membership in the Mediterranean Action Plan (MAP)/Barcelona Convention requires mutual cooperation of the B&H institutions from different departments. Apart from that, it is necessary that the B&H institutions exercise cooperation with entity-level institutions as well. The institutions of B&H having a prominent role in the implementation of obligations from the (MAP)/Barcelona Convention related to the establishment of the response and preparedness system are: Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina (MoFTER B&H), the Ministry of Communications and Transport of Bosnia and Herzegovina (MCT B&H), the Ministry of Security of Bosnia and Herzegovina (MS B&H) and the Border Police of Bosnia and Herzegovina (BP B&H)

The audit findings indicate that the Institutions of Bosnia and Herzegovina have not taken measures to ensure the establishment of a legal framework for the response system. Out of four observed international treaties defining the obligation to establish and maintain a preparedness and response system in case of accidental marine pollution, as well as mutual cooperation of states in this area, the Institutions of Bosnia and Herzegovina ensured ratification of only one treaty, i.e. the Amendments to the Barcelona Convention. Ratification process for the three remaining international treaties has not even started yet. In this regard, the MoFTER B&H has not initiated the accession to the Barcelona Convention Protocol - Protocol Concerning Cooperation in Preventing Pollution from Ships and, in Cases of Emergency, Combating Pollution of the Mediterranean Sea (Emergency Protocol)neither accession to the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC) nor the Protocol on Preparedness, Response and Co-operation to Pollution Incidents by Hazardous and Noxious Substances (OPRC-HNS).

The Institutions of Bosnia and Herzegovina failed to set up a comprehensive coordination mechanism for all those involved in the implementation of obligations from the MAP/ Barcelona Convention related to the establishment of a preparedness and response system in Bosnia and Herzegovina. At the level of the B&H institutions, MoFTER B&H and MCT B&H have prominent roles in this area having regard to their competencies and activities within the MAP/Barcelona Convention bodies. Representative of the MCT B&H is the Prevention Focal Point in REMPEC, in charge, on behalf of B&H of maritime issues and pollution coming from ships, while representatives of the MoFTER B&H attend, on behalf of B&H, regular meetings of the Contracting Parties to the Barcelona Convention. Additionally, implementation of commitments with respect to establishing the response system in case of accidental marine pollution requires engagement of the B&H institutions such as MS B&H, considering the competencies of the Ministry in implementing international commitments and cooperation in the area of civil protection. Despite these facts, regular cooperation between the MoFTER B&H and the MCT B&H as well as other B&H institutions whose scope of work is relevant to the establishment of a response system in accordance with the requirements of the MAP/Barcelona Convention has not been established.

In addition, regular cooperation has not been established neither with the institutions from other levels of government whose engagement is necessary in order to establish the response system in accordance with the requirements arising from B&H's membership in the MAP/Barcelona Convention. Current coordination of all the relevant actors in Bosnia and Herzegovina on the issue takes place through the MAP Focal Point only. However, the reliance on the MAP Focal Point exclusively, without exercising direct mutual cooperation and initiatives in this area, has not resulted in setting-up an accidental marine pollution response system.

No accidental marine pollution contingency plan has been adopted at the level of the Institutions of Bosnia and Herzegovina. In terms of accidental maritime pollutions, the Institutions of Bosnia and Herzegovina rely on the existing protection and rescue system within which the Protection and Rescue Plan was adopted. However, the existing Protection and Rescue Plan does not offer an adequate response to the threat of accidental marine pollution. On the other hand, it offers a solid base for developing a contingency plan. The MoFTER B&H has been, in the existing Protection and Plan, assigned a leading role in coordinating responses in case of environmental and industrial disasters, with the MS B&H and BP B&H providing support to the MoFTER BiH. Despite the fact that the Protection and Rescue Plan recognized responsible institutions no action has yet been taken to adopt the contingency plan of the B&H institutions.

Due to the lack of legal framework, mutual cooperation of responsible institutions as well as a contingency plan B&H faces a risk of suffering greater economic and environmental damage in the event of accidental marine pollution.

The Audit Office of the Institutions of Bosnia and Herzegovina provided recommendations whose implementation should result in creating the

preconditions for efficient management of responses in the event of an accidental marine pollution. Recommendations were sent to the MoFTER BiH, the MS B&H, MCT B&H and BP B&H.

Full audit report:

http://www.revizija.gov.ba/Content/OpenAttachment?Id=92d34add-917d-4336-b445-acc6dadda747&langTag=en

Audit Office of the Institutions in the Federation of Bosnia and Herzegovina

The Audit Office of the Institutions in the Federation of Bosnia and Herzegovina conducted a performance audit titled "Managing interventions in case of accidental pollution of the Adriatic Sea".The audit objective was to examine if the competent institutions in the Federation of B&H have created preconditions for efficient management of interventions in case of accidental pollution of the Adriatic Sea.

Accidental pollution involves sudden spills of hazardous substances that can pollute or worsen the state of water. Such situations are unpredictable and can cause serious consequences to the environment. They require preparation and quick reaction, in order to reduce the environmental consequences as much as possible. Due to the present risks of accidental sea pollution and mandatory international cooperation requirements in this area, proper regulatory and institutional prerequisites, as well as established contingency plans are crucial for adequate response management.

The subject of the audit was an assessment of regulatory, institutional, planning and organizational prerequisites for managing interventions in case of accidental pollution of the Adriatic Sea. The audit covered activities of nine institutions: Federal Ministry of Agriculture, Water Management and Forestry; Federal Ministry of Environment and Tourism; Agency for Watershed of Adriatic Sea; Federal Civil Protection Administration; Federal Ministry of Transport and Communications; Federal Administration for Inspection Affairs; Ministry of Agriculture, Forestry and Water Management of the Herzegovina-Neretva Canton; Ministry of Trade, Tourism and Environmental Protection of the Herzegovina-Neretva Canton and the Municipality of Neum.

The audit showed that, despite the importance of the Adriatic Sea and its vulnerability, basic prerequisites for efficient management of accidental sea pollution have not been established in the Federation of B&H.

It was found that the environmental and water protection regulation requires significant improvements in order to clearly define obligations of the responsible institutions. Also, the legal framework lacks precise sea management and protection rules, which is a serious cause for concern.

Despite the fact that the responsible institutions are aware of these problems, the audit findings indicate that they did not initiate activities in order to properly regulate this area.

Regarding the institutional prerequisites, the audit highlighted the problem of inadequate organizational structure of the water management sector, since the responsibilities of water protection and intervention management are divided and intertwined between ministries responsible for water, ministries responsible for the environment, as well as a number of other institutions from different levels of government. Also, in the institutions responsible for water and environment, the problem of insufficient and inadequate human resources has been present for many years. Inadequate institutional prerequisites significantly reduced the efficiency of water protection activities, especially in setting up the intervention system that should include institutions from other sectors as well.

The legal framework in the Federation of B&H has not prescribed the establishment of contingency plans for accidental sea pollution. Instead, it was envisaged that plans for accidental water pollution should be used in case of coastal pollution.

Audit findings indicate inefficiency of the auditees in drafting and adopting operational contingency plans for accidental water pollution. The first Federal Operational Plan for Accidental Water Pollution of Third Degree of Endangerment was adopted in 2020. On the other hand, the Cantonal ministry in charge of water (HNC) has not even drafted a Cantonal Operational Plan for Accidental Water Pollution, which was supposed to be developed in cooperation with the Agency for watershed of the Adriatic Sea.

Also, the Plan for protection against accidental pollution from ships and for the coastal zone of inland waters, prescribed by the Law on Inland and Maritime Navigation, has not been adopted. According to sources, this Law does not clearly define which institutions should adopt the Plan, yet the Federal Ministry of Transport and Communications, as well as other responsible institutions, have not made efforts to clarify this issue in order to develop this Plan.

When it comes to the Federal Operational Plan, the only one that has been adopted, it was determined that, despite the significant delay in its adoption, it does not contain some of the the elements prescribed by the regulation. Among other, it does not address risk assessment for the occurrence of accidental sea pollution. The audit findings also indicate that there was delay in establishing functional groups, which should ensure the coordination of all relevant institutions in the implementation of Federal operational Plan. Some important stakeholders, such as Port Authority of Neum, Cantonal Ministry of Water and Environment of the Herzegovina-Neretva Canton and Municipality of Neum were not even planned to participate in the operational groups, even though they should have a significant role in case of sea pollution.

Exercises, which should test the planned procedures in case of accidental pollution, have not been carried out, which questions the preparedness of all competent institutions for effective implementation of the Federal Operational Plan.

The Audit Office of the Institutions in the Federation of B&H provided recommendations which should result in setting up the preconditions for better sea protection from accidental pollution. It was highlighted that proper regulation of the Adriatic Sea protection requires proactive cooperation of institutions in the

Federation of B&H together with the state level institutions. Although the focus of this audit was on the preconditions for intervention in case of accidental sea pollution, the given recommendations could contribute to the improvement of the water protection system in the Federation of B&H in a broader sense.

Full audit report:

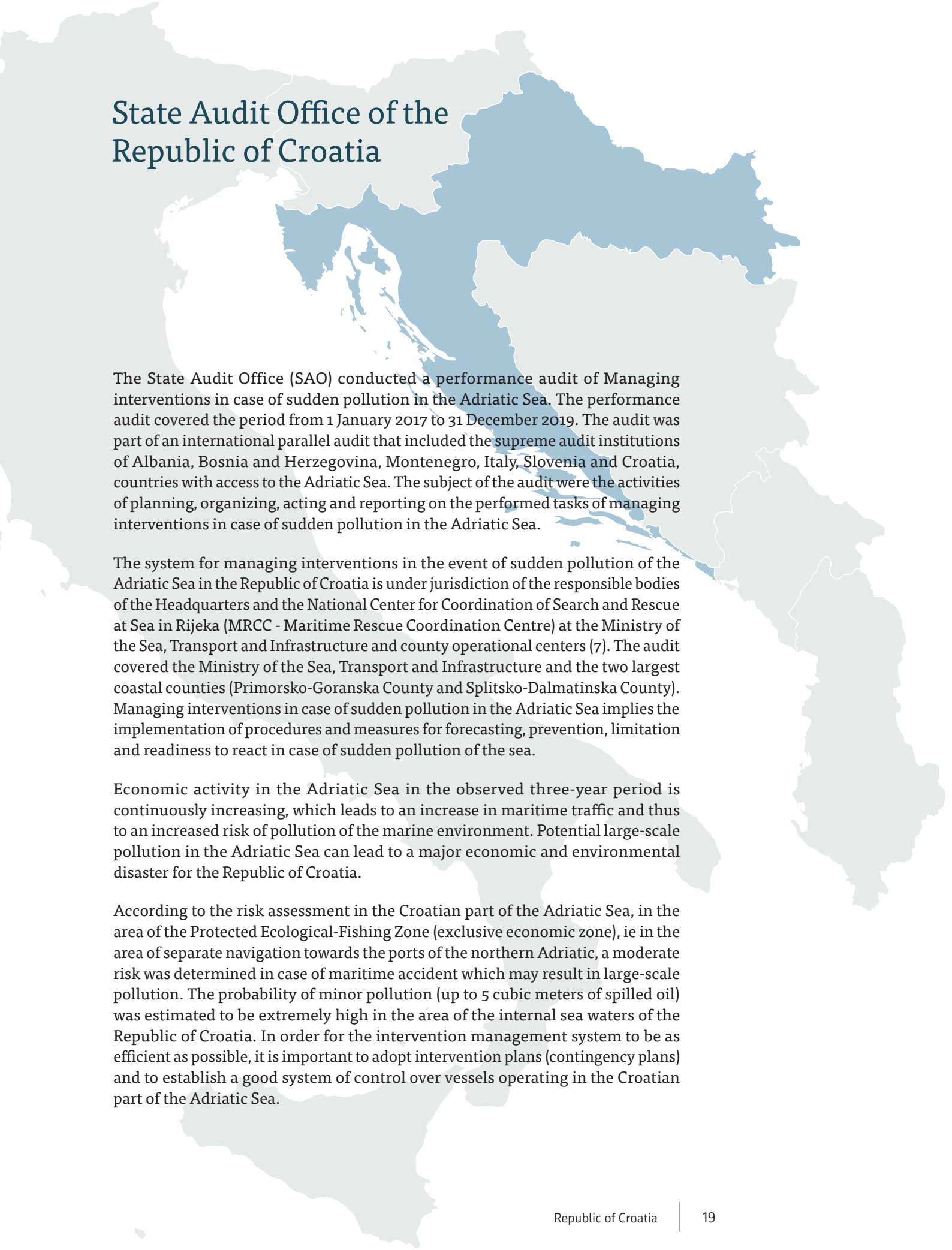
https://www.vrifbih.ba/wp-content/uploads/2021/09/Managing-Interventions-in-Case-of-Accidental-Pollution-of-the-Adriatic-Sea.pdf

REPUBLIC OF CROATIA

STATE AUDIT OFFICE



State Audit Office of the Republic of Croatia



The State Audit Office (SAO) conducted a performance audit of Managing interventions in case of sudden pollution in the Adriatic Sea. The performance audit covered the period from 1 January 2017 to 31 December 2019. The audit was part of an international parallel audit that included the supreme audit institutions of Albania, Bosnia and Herzegovina, Montenegro, Italy, Slovenia and Croatia, countries with access to the Adriatic Sea. The subject of the audit were the activities of planning, organizing, acting and reporting on the performed tasks of managing interventions in case of sudden pollution in the Adriatic Sea.

The system for managing interventions in the event of sudden pollution of the Adriatic Sea in the Republic of Croatia is under jurisdiction of the responsible bodies of the Headquarters and the National Center for Coordination of Search and Rescue at Sea in Rijeka (MRCC - Maritime Rescue Coordination Centre) at the Ministry of the Sea, Transport and Infrastructure and county operational centers (7). The audit covered the Ministry of the Sea, Transport and Infrastructure and the two largest coastal counties (Primorsko-Goranska County and Splitsko-Dalmatinska County). Managing interventions in case of sudden pollution in the Adriatic Sea implies the implementation of procedures and measures for forecasting, prevention, limitation and readiness to react in case of sudden pollution of the sea.

Economic activity in the Adriatic Sea in the observed three-year period is continuously increasing, which leads to an increase in maritime traffic and thus to an increased risk of pollution of the marine environment. Potential large-scale pollution in the Adriatic Sea can lead to a major economic and environmental disaster for the Republic of Croatia.

According to the risk assessment in the Croatian part of the Adriatic Sea, in the area of the Protected Ecological-Fishing Zone (exclusive economic zone), ie in the area of separate navigation towards the ports of the northern Adriatic, a moderate risk was determined in case of maritime accident which may result in large-scale pollution. The probability of minor pollution (up to 5 cubic meters of spilled oil) was estimated to be extremely high in the area of the internal sea waters of the Republic of Croatia. In order for the intervention management system to be as efficient as possible, it is important to adopt intervention plans (contingency plans) and to establish a good system of control over vessels operating in the Croatian part of the Adriatic Sea.

In the Republic of Croatia, the preparedness of the emergency pollution management system is regulated by the National Contingency Plan for Sudden Marine Pollution and county intervention plans. The navigation control system is under the jurisdiction of the Vessel Traffic System (VTS) at the Ministry of the Sea, Transport and Infrastructure, which performs the activities of the organization of navigation and maritime traffic management. Supervision and management of maritime traffic is carried out in order to increase the safety of maritime navigation and to protection the marine environment. In doing so, all necessary data on maritime facilities and maritime traffic are collected. VTS provides information support important for the safe navigation of maritime facilities and controls the traffic of ships by satellite and other equipment that enables the identification and active monitoring of ships, using the system of tracking and identification of ships. Monitoring of the state of the marine environment in the Croatian part of the Adriatic Sea is performed by regular patrols by sea-cleaning ships as well as ships, aircraft and helicopters of the Coast Guard along with ships of Harbor Master's Offices and since 2019 by drones.

The SAO has found that the responsible authorities are taking many actions related to the implementation of procedures and measures to anticipate, prevent, limit and be prepared to respond to sudden marine pollution, but that there are certain weaknesses in the system. The Republic of Croatia, with its Contingency Plan for Sudden Marine Pollution, has not determined the procedures and programs for professional training of participants to implement the necessary measures in case of sudden marine pollution and the manner and conditions of equipping and using material, technical and other means, manner and conditions of implementing procedures and measures in offshore research and hydrocarbon exploitation and manner of maintaing order and safety in interventions. The manner in which concessionaires of special purpose ports and port authorities should participate in the implementation of the said plan has not been determined either.

The Ministry of the Sea, Transport and Infrastructure has prepared an analysis of existing specialized equipment and specialized vessels available in the event of sudden marine pollution owned by specialized companies and coastal counties. Based on the above, a list of appropriate and necessary equipment (floating protective dams, skimmers, pumps and tanks for receiving oily waste) is given, which the competent responsible authorities should have at their disposal in view of the existing risks. It was found that the existing specialized companies and coastal counties have specialized equipment that can be used only for minor pollution (up to 10 cubic meters). The only exception is the area of the Kvarner Gulf (Port of Rijeka) where there is equipment that can react to slightly higher pollution, but the existing available equipment is not adequate for the open sea area. In the Republic of Croatia, ten cleaning boats are constantly on standby. Of this number, five boats are owned by coastal counties, and five are owned by legal entities, with which coastal counties have concluded contracts for cleaning services.

For minor marine pollution, coastal counties have satisfactory equipment and ships and have concluded contracts with companies that have the equipment and ships. These minor sea pollutions have been successfully remedied.

The national and county contingency plans do not specify the regular maintenance and manner of maintenance, servicing and testing and storage of the necessary equipment (to be easily accessible) and the maintenance of county-owned cleaning boats.

The SAO also found that at the regional level the lists of registered and authorized legal entities and craftsmen who own special equipment and participate in interventions in case of sudden sea pollution are updated, while the list published on the website of the Ministry of the Sea, Transport and Infrastructure is not updated. There are no contractual relations with the legal entities listed in the mentioned lists and it is not possible to determine whether their equipment is in technically correct condition, whether all the listed equipment is available in case of sudden sea pollution, whether it is physically easily accessible so that it can be put into use quickly in case of sudden pollution and whether there are enough professionally trained and skilled staff to put the equipment into operation.

According to the National Contingency Plan for Sudden Marine Pollution, it is possible to activate the available technical and human resources of the Coast Guard of the Republic of Croatia. Activating the Coast Guard in a situation of large-scale sudden sea pollution in the Croatian part of the Adriatic Sea would be more effective if the Coast Guard had sufficient equipment to prevent and limit the spread of large-scale sea pollution. The Coast Guard has adequate storage facilities for disposing of equipment, trained people who successfully conducted demonstration exercises during 2019 and 2020, a ship adapted for the use and installation of dams at sea, and ships for monitoring the sea. In view of the above, it is necessary to determine sufficient equipment (dams, skimmers, etc.) that the Coast Guard would use for rapid interventions in the event of sudden large-scale pollution of the sea on the high seas. Also, the availability of equipment would enable the Coast Guard to continuously conduct exercises, which would ensure the readiness and training of the ship's crew. In order for the system of protection and preservation of the sea to be as successful as possible, rapid and effective intervention in case of sudden sea pollution is needed, which includes, among other things, pre-equipped, trained and educated persons to deal with sudden sea pollution. The performance audit found that for major marine pollution on the Croatian side of the Adriatic Sea, there is not sufficient appropriate specialized equipment to respond to sudden marine pollution with oils and other hazardous and harmful substances. The Ministry of the Sea, Transport and Infrastructure, in cooperation with the Ministry of Defence, should determine the necessary equipment for the activities of the Coast Guard in preventing and limiting marine pollution in the Croatian part of the Adriatic Sea.

In the revised period, trainings were conducted at the national level. There is no company or institution in the Republic of Croatia, accredited by the competent body in charge of preparedness and response to sudden pollution in the marine environment, which prepares and provides trainings according to the model of the International Maritime Organization (IMO). According to the SAO, all trainings should be organized according to the globally accepted model of the IMO for Response to Sudden Marine Pollution and find authorized advisors (establish a list of advisors with the necessary competencies) who can be invited and included in case of pollution remediation process. In the audited period, regular annual demonstration exercises were held at the national level.

These demonstration exercises included checking the communication system, exercises to check the readiness to carry out sea and coastal clean-up operations, as well as forwarding information to the media and analysing the conducted demonstration exercise.

During the revised period, 26 minor marine pollutions occurred in the area of the two coastal counties, which were successfully remedied without formal activation of county plans for interventions in the event of sudden marine pollution. No necessary documentation was kept for the pollution that occurred, nor were written decisions made on how to remove marine pollution and other decisions provided for in the above-mentioned county intervention plans. In some cases of minor marine pollution, the extent of marine pollution has not been estimated. For minor marine pollution for which it is not necessary to carry out major remediation and cleaning activities in the area under the jurisdiction of coastal counties, and in order to reduce administrative and other costs provided by activating county intervention plans, it is necessary to prescribe a step-by-step procedure and keep prescribed documentation for all marine pollution.

In cases of sudden marine pollution in the Republic of Croatia, it is prescribed that the polluter bears all costs incurred by the pollution of the marine environment. In the revised period, the largest pollution from a known pollutant in the Croatian maritime area occurred in June 2018 in the Bay of Raša, near Plomin. During the loading of motor fuel on the cargo ship, about 8 cubic meters of fuel spilled into the sea. In addition to the sea surface, the pollution with motor fuel also affected a large part of the coast and moored vessels. In addition to the above, the biggest threat to marine pollution also occurred in June 2018, when a shipwreck carrying 3,000 tons of magnesite occurred in the Split archipelago. There was a sea penetration into the engine room and there was a danger of the ship sinking, but the damage was temporarily repaired and the ship was towed to the Trogir shipyard. The rescue operation of the sailors and the ship lasted for five days. Due to the pollution of the sea in the Bay of Raša and due to the intervention in rescuing the ship in the Split archipelago, costs were incurred which were covered by the ship owners. In the case of sudden marine pollution when the polluter is not known according to the National Contingency Plan for Sudden Marine Pollution, the costs of intervention and remediation shall be financed from the state budget. It was found that funding sources for such interventions were not planned. Due to the above, the SAO is of the opinion that the Ministry of the Sea, Transport and Infrastructure, in cooperation with the Ministry of Finance, the Ministry of Economy and Sustainable Development and Environmental Protection and Energy Efficiency Fund, should provide funding to cover costs when the pollutant is unknown.

In July 2020, the Ministry of the Sea, Transport and Infrastructure conducted an open public procurement procedure with several economic entities for services of implementing measures to intervene to protect the sea from pollution. This included the procurement of equipment and resources for interventions in the event of sudden marine pollution, including the rental of vessels, tugs, specialized equipment, consulting services, protective dams and special pollution control systems. The planned public procurement procures the necessary equipment and vessels for interventions on the high seas.

Based on the conducted audit, the SAO assessed that the Republic of Croatia has normatively and organizationally regulated the management of interventions in the event of sudden sea pollution, but is not able to successfully intervene in the event of major sea pollution. Due to the above, special attention should be paid to the procurement of necessary equipment for relatively large sudden sea pollution and the activation of resources available to the Coast Guard of the Republic of Croatia, and it is necessary to prescribe a step-by-step procedure for sudden sea pollution. Coastal counties are successfully implementing pollution control interventions in their area and the remediation of small-scale sea pollution, as well as the prevention of potential shipwrecks. Consequently, the SAO assessed that the managing interventions in the case of sudden pollution in the Adriatic Sea under the jurisdiction of coastal counties was effective, with some improvements needed, while the management of interventions in the event of sudden pollution in the Adriatic Sea under the Ministry of the Sea, Transport and Infrastructure the SAO assessed as partially effective, primarily because the Republic of Croatia does not have sufficient equipment to prevent and limit large-scale marine pollution.

According to the SAO, the equipment and ships needed for intervention in large-scale pollution should be provided at the level of the Republic of Croatia and used for the entire Croatian part of the Adriatic Sea. Furthermore, the Ministry of the Sea, Transport and Infrastructure should develop an intervention management system in cooperation with the Ministry of Defence, using existing resources (Coast Guard) to make the system as efficient as possible and better use of equipment and ships. Also, it is necessary to strengthen regional cooperation of all coastal states in the Adriatic Sea, especially in the part of monitoring the situation and in case of sudden sea pollution because any major pollution in the territorial sea of one of the coastal states can affect the entire Adriatic ecosystem.

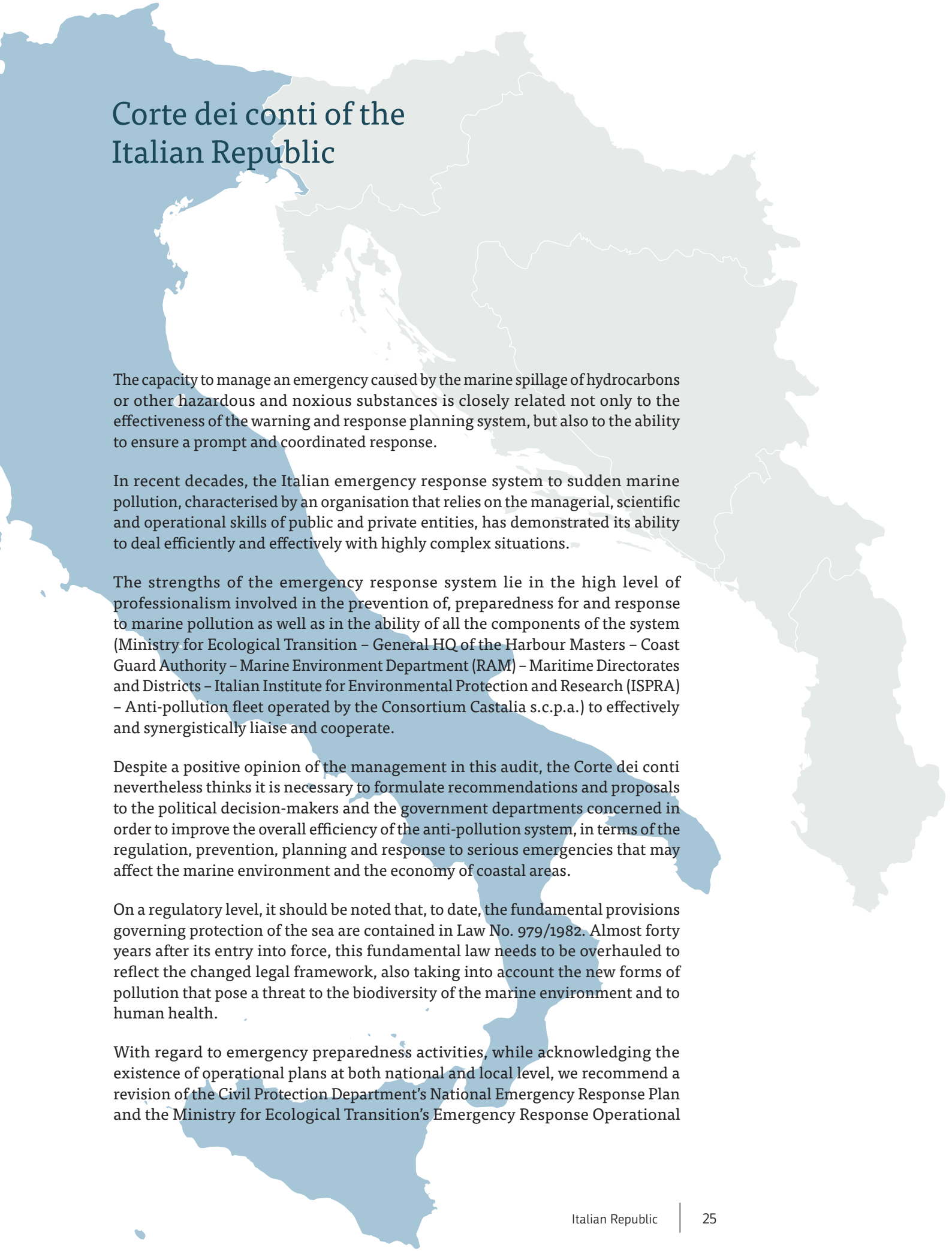
Full audit report:

https://www.revizija.hr/UserDocsImages/ENG/Reports/2020/MANAGING_INTERVENTIONS_IN_CASE_OF_SUDDEN_POLLUTION_IN_THE_ADRIATIC_SEA-Full%20Report.pdf

CORTE DEI CONTI



Corte dei conti of the Italian Republic



The capacity to manage an emergency caused by the marine spillage of hydrocarbons or other hazardous and noxious substances is closely related not only to the effectiveness of the warning and response planning system, but also to the ability to ensure a prompt and coordinated response.

In recent decades, the Italian emergency response system to sudden marine pollution, characterised by an organisation that relies on the managerial, scientific and operational skills of public and private entities, has demonstrated its ability to deal efficiently and effectively with highly complex situations.

The strengths of the emergency response system lie in the high level of professionalism involved in the prevention of, preparedness for and response to marine pollution as well as in the ability of all the components of the system (Ministry for Ecological Transition – General HQ of the Harbour Masters – Coast Guard Authority – Marine Environment Department (RAM) – Maritime Directorates and Districts – Italian Institute for Environmental Protection and Research (ISPRA) – Anti-pollution fleet operated by the Consortium Castalia s.c.p.a.) to effectively and synergistically liaise and cooperate.

Despite a positive opinion of the management in this audit, the Corte dei conti nevertheless thinks it is necessary to formulate recommendations and proposals to the political decision-makers and the government departments concerned in order to improve the overall efficiency of the anti-pollution system, in terms of the regulation, prevention, planning and response to serious emergencies that may affect the marine environment and the economy of coastal areas.

On a regulatory level, it should be noted that, to date, the fundamental provisions governing protection of the sea are contained in Law No. 979/1982. Almost forty years after its entry into force, this fundamental law needs to be overhauled to reflect the changed legal framework, also taking into account the new forms of pollution that pose a threat to the biodiversity of the marine environment and to human health.

With regard to emergency preparedness activities, while acknowledging the existence of operational plans at both national and local level, we recommend a revision of the Civil Protection Department's National Emergency Response Plan and the Ministry for Ecological Transition's Emergency Response Operational

Plan, with a view to eliminating the current shortcomings and standardising the technical aspects and intervention procedures, so as to provide a single reference framework for national operators and international partners on emergency response procedures to marine pollution.

With reference to emergency plans for coastal protection, it is noted that the risk of oil slicks is not adequately mitigated either by specific intervention plans or by the availability of adequate means and equipment (booms, skimmers, cleaning tools, mechanical removal equipment). Therefore, it is highly desirable for the Civil Protection Department to exert a propulsive and coordinating action on the regional and local Civil Protection Services, for the purpose of supplementing the provincial and local plans with special sections dedicated to the management of coastal pollution.

On the prevention side, while acknowledging the efforts made by all the components of the system, our recommendation is to ensure, on the basis of a shared methodology, a constant update of the oil spill risk index, and the definition of the main environmental and socio-economic indicators, taking into account the data on maritime traffic volumes of potentially polluting substances (number of ships and quantity of goods handled) and on the accidents recorded in the various maritime districts.

Also, on the subject of prevention, special attention should be paid to the training programmes of the Harbour Masters/Coast Guard personnel. In this regard, it is underlined how the experiences built up as a result of the exercises and fight against pollution represent an important fact-finding tool that can be shared through digital and communication systems in order to foster the circulation and socialisation of the data, to the benefit of the organisational learning.

As far as the emergency response activities are concerned, Italy tackles the environmental risks arising from oil spills through a consortium of companies which operates by deploying a fleet of vessels equipped to contain and remove the polluting substances. In view of the changed structure of the naval anti-pollution system, our recommendation is to verify the adequacy of the vessels deployed in the maritime areas with the heaviest oil tanker traffic (for the Adriatic Sea, this includes, first and foremost, the northern Adriatic Sea and in the Strait of Otranto) towards all the Adriatic Sea ports, as well as the possible activation of a second line of response that could consist of anti-pollution vessels to be mobilised in the more serious cases of emergency.

On the financial side, there has been a gradual reduction in the amount of resources allocated to the Directorate-General for the Sea and Coasts of the Ministry for Ecological Transition (MITE) for activities to prevent and combat pollution from hydrocarbons and other hazardous and noxious substances, despite an increase in the risks posed not only by the heavy oil tanker traffic, but also by the gradual increase in other major forms of pollution, such as the massive presence of plastic waste.

On the same subject, it should be noted that cost savings and additional financial resources could be achieved by wider participation in calls for proposals launched by

the EU for the implementation of applied research projects and innovative systems in the field of oil spill prevention and management. Furthermore, to achieve greater impact, private-sector fundraising through calls for sponsors and crowdfunding projects could provide additional resources for targeted environmental projects.

With a view to redistributing the costs of environmental protection and ensuring the medium-to-long-term sustainability of an effective marine pollution preparedness and response system, the possibility of charging environmental fees on hydrocarbons or other hazardous and noxious substances (loaded and unloaded in ports) could be explored. Sharing these fiscal policy measures at the EU and EUSAIR Member State level, together with the provision of a common minimum rate to avoid competitive asymmetries, would ensure definite financial resources that could be used to enhance the national prevention and emergency response mechanisms.

The environmental risks associated with heavy commercial traffic of potentially polluting substances in marine environments necessarily requires cross-border cooperation in the field of prevention and emergency response. The experience built up to date within the framework of the projects financed by the European Union for the Adriatic-Ionian Region provides concrete tools for drawing a map of the most vulnerable areas and for launching projects aimed at improving early warning and response mechanisms to contain serious pollution accidents.

It is to be hoped that a common emergency response plan for all the States bordering the Adriatic Sea will be adopted within a reasonable timeframe. Pending the formalisation of a cooperation agreement based on a fair contribution of resources by the participants, intervention protocols should be agreed on a bilateral or multilateral basis for areas with heavy oil and chemical tanker traffic near the borders of several states, accompanied by annual joint exercise programmes.

The start of a constructive dialogue on the issues of shipping safety and the fight against marine pollution, facilitated by the cultural, social and economic links that unite the two Adriatic seaboards, could be the first step towards the attainment of further results, consistent with the objectives of the EUSAIR Strategy and the UN 2030 Agenda, such as the establishment – within an international co-operation body – of a permanent Committee for the conservation and protection of the Adriatic Sea, as an institutional forum for exchanging information and experiences, disseminating and transferring good practices and developing joint environmental projects.

Full audit report:

https://www.corteconti.it/HOME/Documenti/DettaglioDocumenti?Id=05a1a8ac-bed8-4082-b906-614a7872c703



State Audit Institution of Montenegro



The State audit institution (SAI) conducted a performance audit reviewing whether the authorities in charge of protecting the Adriatic Sea from sudden pollution are adequately prepared for an effective response. The subject of the audit were the activities and measures of competent authorities on prevention, reduction and elimination of consequences of sudden pollution in the Adriatic Sea. The audit covering the period of four years, that is 2017 – 2020 was carried out at the audited entities - Administration of Maritime Safety and Port Management (AMSPM), Ministry of Transport and Maritime Affairs - Directorate General of Maritime Traffic - Regional Unit – Harbour Master's Office Bar and Regional Unit - Harbour Master's Office Kotor, Inspectorate of Maritime Safety, Ministry of Sustainable Development and Tourism - Directorate General for Climate Change and Mediterranean Affairs, Environmental Protection Agency, PE for Coastal Zone Management, Hydrocarbons Administration, Ministry of Interior - Directorate General for Emergency Situations.

The performance audit pointed out limited capacities and some weaknesses influencing effectiveness of the protection system of the Adriatic Sea from sudden pollution.

There is a lack of established adequate system for responding to large-scale sudden pollution (level 3) in the part of satisfactory material and technical and human resources, making maps of sensitive areas, constant risk assessment and other issues of importance for adequate response. The revised National emergency response plan in case of marine pollution from vessels from 2011 has not been adopted and appropriate coordination has not been established between all participants who have a role in the National Plan. The regional agreement for joint response has not been signed, required conventions have not been ratified and all obligations from ratified documents have not been fulfilled.

The audit points out that not all activities, recommendations and all environmental protection measures from the Report on the Strategic Assessment of the Environmental Impact of the Hydrocarbon Exploration and Production Programme of Montenegro have been implemented. Directive 2013/30/EU on the safety of offshore oil and gas activities has not yet been implemented in Montenegrin legislation because the Law on Safety Measures for Offshore Hydrocarbon Exploration and Production has not been adopted.

Accordingly, the State audit institution has identified that the existing system of protection against sudden marine pollution is not efficient enough, and that additional and more effective measures are required to improve it.

The audit showed that the competent authorities of Montenegro still have to adopt numerous documents that will ensure better preconditions for a more efficient system. The SAI points out that the transposition of very important conventions and protocols into national law has not been carried out. Activities related to marine protection are ensured through the established strategic legal framework, which represents a good basis for efficient fight against sudden marine pollution. However, although comprehensive, the strategic policy has not been fully implemented in practice. The audit has found that the commitments expressed in the strategic documents did not adequately find their place in the regulations that were adopted, which would establish a legally binding basis for their implementation. The system proved to be insufficiently efficient in the process of realisation of obligations defined through strategies, laws and action plans.

A national regime for responding to pollution that includes hazardous and harmful substances has not yet been established. Meanwhile, Montenegro lacks a normative framework for responding to chemical spills, including clear roles and responsibilities.

Although the Law on Marine Protection envisages the establishment of interagency cooperation through the formation of the Coordinating Body for Marine Protection, in order to monitor and improve the situation in this area, it has not been formed, but after the audit process, the procedure of its formation was initiated, while drafting internal acts is in the final stage. Activities on the preparation of the initial assessment of the state of marine environment, objectives and related indicators for achieving and maintaining good marine environment, criteria and methodological standards of good state of marine environment are underway, through the support of the IPA project Support to the implementation and monitoring of water management in Montenegro and it is expected to be prepared within the legal deadlines.

A review of the provisions of the Law on the Protection of the Sea against Pollution from Vessels and its application in practice showed that certain provisions of the law have not been fully applied.

It has been found that there is no adequate risk assessment associated with oil spills from ships, (also from offshore installations), nor are there any formal processes that ensure reassessment of risks on an ongoing basis. AMSPM, although a leading institution for responding to oil spills from ships, has not conducted an assessment of its capacity to respond to oil spills. Given the lack of recent capacity analysis and the lack of up-to-date knowledge on risks, AMSPM does not have an assessment of whether its oil spill response capacity is appropriate to address these risks.

The dynamics of drafting the National Plan for Emergency Response in the Event of Marine Pollution from Vessels is not appropriate, having in mind the fact that the first version was adopted in 2011, and that even after nine years, it has not been

drafted in full. Postponing the preparation of the annex to the National emergency response plan in the event of marine pollution from vessels and performing analysis and assessment of the risk of marine pollution is an aggravating circumstance for effective prevention, especially given that the risk of pollution is high. The process of creating specialised databases was not objectively initiated. Due to these shortcomings, the necessary conditions for the effective implementation of the National emergency response plan in case of marine pollution from vessels have not been ensured.

In addition, it has been found that no coastal municipality has developed a local plan and risk assessment in the event of sudden marine pollution.

The audit has found that no guidelines were provided for the cleaning of the polluted coast, temporary storage of collected oil at a location on the coast, the plan to rehabilitate the site on the shore where the collected oil is stored and flora and fauna rehabilitation plan.

The audit has identified satisfactory material and technical resources in the Administration of Maritime Safety and Port Management, in case of small and medium pollution (level 1 and 2), but in case of large-scale pollution (level 3) Montenegro does not have the equipment for adequate response. A prerequisite for the efficient use of financial resources for material and technical equipment is the establishment of a quality national database, and a quality needs analysis. During the audit, the lack of a central database system on material and technical resources was identified. Staff training in case of sudden sea pollution is satisfactory. The adequate use of dispersants is not regulated in accordance with the requirements of international conventions.

The system of information exchange and communication is present, but not at an adequate level. An organisational framework for the coordination of measures and activities at the level of Montenegrin institutions has been defined, but there are still weak points that need to be improved. Thus, the audit has found that coordination was limited. In addition, the communication of inspection services must be intensive and systematic, both from the local and state level. The main shortcomings of this area include the mutual incompatibility of existing databases and the exchange of data between individual entities. There are still examples of data retention and insufficient cooperation.

Montenegro has an analysis of the degree of readiness to respond to the crisis situation, including equipment with material and personnel, through the Analysis of the Interdepartmental Exercise Adriatic 2019. Although Montenegro was a participant in the HAZADR project (Strengthening the joint reaction capability to combat marine pollution with oil, toxic and dangerous substances in the Adriatic Sea), the application of the results from this project is limited.

The audit has showed that there is no established practice of conducting detailed analyses after each crisis situation in order to simultaneously identify elements that worked well during a particular crisis situation and elements that did not work and that need to be changed or improved in the future. None of the cases analysed in our sample contained a post-incident assessment.

There is no central record documenting all relevant information related to the incident, including environmental or social and economic damage. Thus, information on environmental impacts does not exist. Incomplete documentation of pollution responses affects the ability of AMSPM to know how well it is achieving its objectives, which in turn is important for conducting risk assessments and assessing the adequacy of equipment and capacity.

The targeted control and assessment of the condition of the marine protection segment was not performed within the Directorate for Monitoring in MTMA. The lack of an adequate monitoring and control mechanism at all levels does not guarantee that the responsible institutions will fulfil their obligations in a timely manner, and that the measures will be implemented with a significant delay.

There is a problem of intentional pollution of the sea, which is not sufficiently punished and whose penalties do not generate a deterrent effect from illegal acts / behaviour. The audit established that, as of October 15, 2020, the Administration for Inspection Affairs did not perform any supervision in the field of oil and gas exploration.

Based on the presented findings and conclusions, the State Audit Institution (SAI) has recommended to Administration of Maritime Safety and Port Management to: assess its response capacity, taking into account the capacity of all participants who have a role in the National Plan and use this information when making future investment decisions; carry out risk assessments related to oil spills from ships and offshore sources and establish adequate risk updates as necessary and establish procedures to ensure that recommendations and lessons learned from national exercises serve to improve the National emergency response plan in case of marine pollution from vessels.

Ministry of Transport and Maritime Affairs should draft and propose to the Government a new Law on Protection of the Sea from Pollution from Vessels in accordance with ratified conventions; ensure that the necessary annexes accompanying the National emergency response plan in case of marine pollution from vessels are developed; accelerates ratification of international conventions and protocols; develop guidelines for the establishment of a regulatory framework for the discharge of hazardous and noxious substances into the Montenegrin marine environment; intensifies inspections related to pollution prevention; accede to the regional agreements; having in mind the development of international cooperation in the subject area and requirements related to further development of multilateral agreements and consider possibility of submitting a joint initiative of the countries of the Adriatic region as “areas of joint management” for maritime areas in order to submit a joint request of the EC to obtain funds for procurement of equipment in case of large-scale pollution in the Adriatic Sea (With the participation of non-EU countries/candidate countries).

The Environmental Protection Agency is recommended to initiate activities, through interagency cooperation, in order to form the Unit/Commission for Environmental Management, in order to adequately control the impact of future activities planned by the Programme of exploration and production of hydrocarbons in the Montenegrin seabed on the environment and complete activities on the

development of protection studies for marine protected areas, in accordance with the Law on Nature Protection.

The Ministry of Capital Investments and the Hydrocarbons Administration should implement the planned activities in accordance with the recommendations for the protection of biodiversity and environmental protection measures set out in the Report on the Strategic Environmental Assessment of the Programme of Exploration and Production of Hydrocarbons in the Seabed of Montenegro.

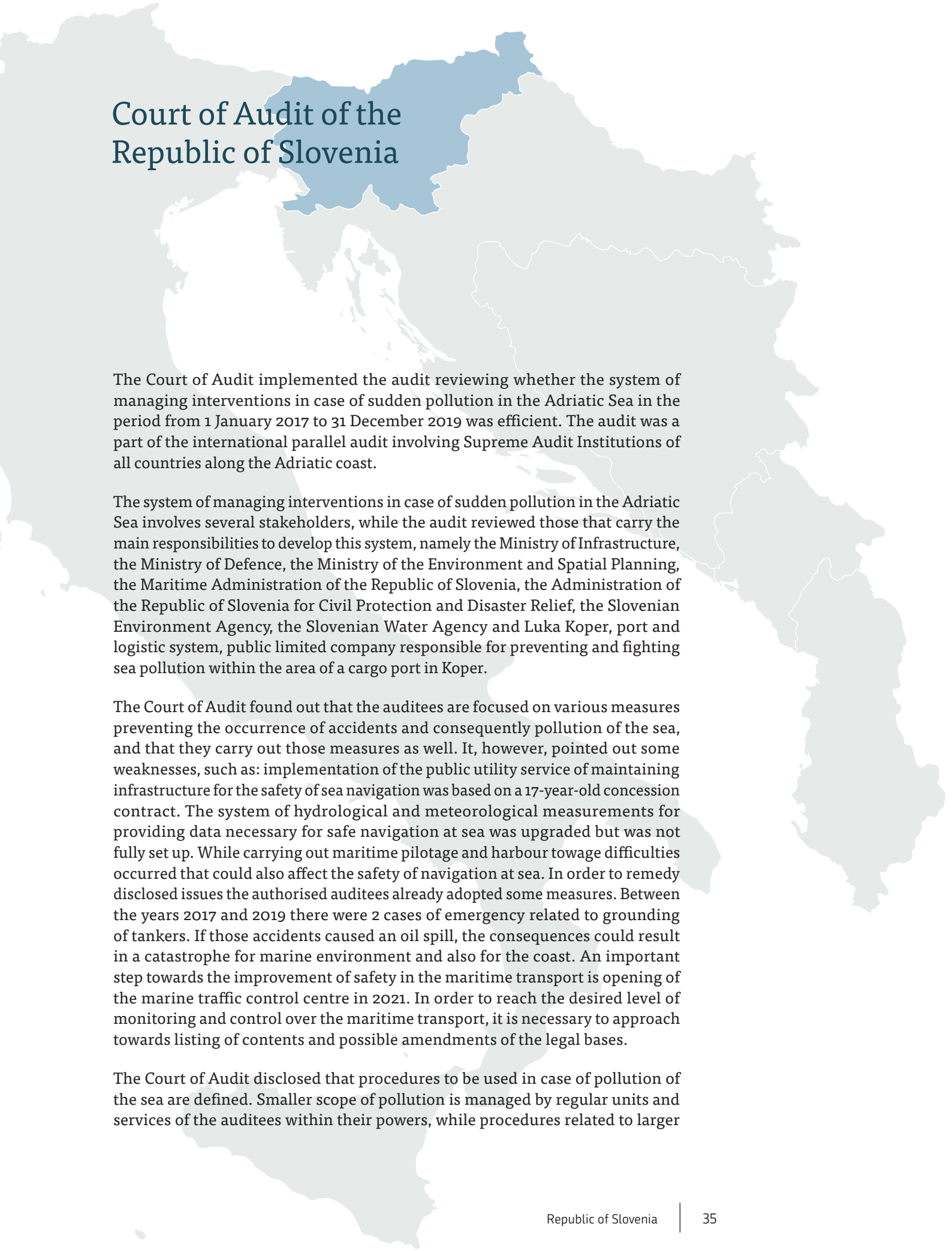
Full audit report:

http://www.dri.co.me/1/doc/Mannaging%20interventions%20in%20case%20of%20sudden%20pollution%20in%20tha%20Adriatic%20sea.pdf

REPUBLIC OF SLOVENIA
COURT OF AUDIT



Court of Audit of the Republic of Slovenia



The Court of Audit implemented the audit reviewing whether the system of managing interventions in case of sudden pollution in the Adriatic Sea in the period from 1 January 2017 to 31 December 2019 was efficient. The audit was a part of the international parallel audit involving Supreme Audit Institutions of all countries along the Adriatic coast.

The system of managing interventions in case of sudden pollution in the Adriatic Sea involves several stakeholders, while the audit reviewed those that carry the main responsibilities to develop this system, namely the Ministry of Infrastructure, the Ministry of Defence, the Ministry of the Environment and Spatial Planning, the Maritime Administration of the Republic of Slovenia, the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief, the Slovenian Environment Agency, the Slovenian Water Agency and Luka Koper, port and logistic system, public limited company responsible for preventing and fighting sea pollution within the area of a cargo port in Koper.

The Court of Audit found out that the auditees are focused on various measures preventing the occurrence of accidents and consequently pollution of the sea, and that they carry out those measures as well. It, however, pointed out some weaknesses, such as: implementation of the public utility service of maintaining infrastructure for the safety of sea navigation was based on a 17-year-old concession contract. The system of hydrological and meteorological measurements for providing data necessary for safe navigation at sea was upgraded but was not fully set up. While carrying out maritime pilotage and harbour towage difficulties occurred that could also affect the safety of navigation at sea. In order to remedy disclosed issues the authorised auditees already adopted some measures. Between the years 2017 and 2019 there were 2 cases of emergency related to grounding of tankers. If those accidents caused an oil spill, the consequences could result in a catastrophe for marine environment and also for the coast. An important step towards the improvement of safety in the maritime transport is opening of the marine traffic control centre in 2021. In order to reach the desired level of monitoring and control over the maritime transport, it is necessary to approach towards listing of contents and possible amendments of the legal bases.

The Court of Audit disclosed that procedures to be used in case of pollution of the sea are defined. Smaller scope of pollution is managed by regular units and services of the auditees within their powers, while procedures related to larger

scope of pollution are defined in regional plan of protection and disaster relief operations when accidents occur at sea. Thereby, the Court of Audit found out that responsibilities of those that have the permits to use water, i.e. harbours, related to cleaning and remedying water pollution including the tasks of removing collected waste and substances were not always defined in the issued decisions. Also the responsibilities for cleaning the coast and offshore areas were not clearly defined. The auditees did not clarify the legal bases enough for the Maritime Administration of the Republic of Slovenia and the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief to be able to impose on the polluters the costs of activities undertaken when intervening against the pollution of the sea.

The Court of Audit also established several weaknesses related to the content of the current regional plan of protection and disaster relief operations. All foreseen plans of the state bodies, where tasks of each body are defined in case of activating the plan of protection and disaster relief operations, were not developed respectively were not up-to-date. The Court of Audit assessed that readiness to cooperate and commitment of the stakeholders to participate would be better and more firm if the plan of protection and disaster relief operations was developed at the state level. The Republic of Slovenia would have to ask other states for the assistance when its own resources for protection and disaster relief operations in the case of pollution would not suffice. On the basis of the international agreements and conventions the Republic of Slovenia can ask for help other countries and international organisations or can get involved in cross-border actions to prevent or respond in case of major emergency in the Adriatic Sea.

The Slovenian system of managing interventions in case of sudden pollution in the Adriatic Sea foresees gradual activation of forces and means for protection and rescue. In case of larger scope of pollution at sea respectively when capacities of the Maritime Administration of the Republic of Slovenia would not suffice to remedy the consequences of the pollution, additional forces of protection, rescue and assistance are activated through the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief including the request for international assistance. The Court of Audit also established that there was no joint overview of the necessary protection and rescue equipment available in the state if an ecological disaster at sea occurred. The assessment of the necessary equipment that should be at disposal of to the Republic of Slovenia and which should consider the scope of maritime transport, the amount and type of cargo transferred in the Gulf of Trieste and in the Adriatic Sea was not developed. Nevertheless, the auditees estimated that they have sufficient equipment needed to intervene in case of smaller scope of pollution. The data related to available human resources who can intervene in case of large scope of pollution were not complete, furthermore there was no joint overview of human resources who could be involved in such interventions. After the completion of the audit, the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief drew up a new overview of the equipment as well as an overview of human resources trained to intervene in case of large scope of pollution at sea.

Education and training of the participants involved in the interventions are carried out regularly, i.e. in the Republic of Slovenia as well as abroad, in the form of drills open to a wide range of participants what was pointed out by the Court of Audit as

positive practice. In case of sudden pollution at sea, good cooperation among all stakeholders authorised for preventing sudden sea pollution and for intervening when pollution occurs is a crucial precondition for effective and efficient responding mainly in cases of a major emergency. According to the assessment of the Court of Audit, it would be appropriate that auditees implement drills also to check operational readiness in cases of dangerous chemicals pollution whereby they could review the availability of necessary equipment to be used and personal protective equipment for such type of pollution.

In the event of a major emergency the auditees would ask each other for help, when their capacities for temporary storage of collected waste and substances are filled. The Court of Audit found out that there was no protocol defined when capacities of all participants are filled. Additionally, the location of common temporary disposal of waste was not selected.

On the basis of the implemented audit, the Court of Audit issued an opinion that the system of intervening in case of smaller scope of pollution was partially efficient. Special attention should be placed on the field of mobilisation in case of major emergency which was not efficient in the opinion of the Court of Audit. In this context, the key element is good cooperation among all stakeholders with powers in the field of preventing sudden pollution at sea and powers to intervene in cases of pollution in the Republic of Slovenia. According to the opinion of the Court of Audit, the aforementioned is a necessary precondition for efficient and effective responding in cases of sudden pollution at sea, especially in the events of major emergency. Furthermore, full commitment to cooperating with the international community is of vital importance, since any major pollution along the Adriatic Sea can represent a significant ecological threat to all countries on the shores of the Adriatic Sea.

Full audit report:

https://www.rs-rs.si/en/audits-auditing/audit-archive/audit/efficiency-of-the-intervention-management-system-in-the-case-of-a-sudden-pollution-of-the-adriatic-s/

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September 2021



