

# IED BREF Update

BCCI HSE conference, Sofia March 28<sup>th</sup>, 2019

Stefan Drees, Cefic BREF Manager





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day



- Update on WGC BREF
- BREF news
- News from EU COM



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# WGC BREF





## Status Data Collection

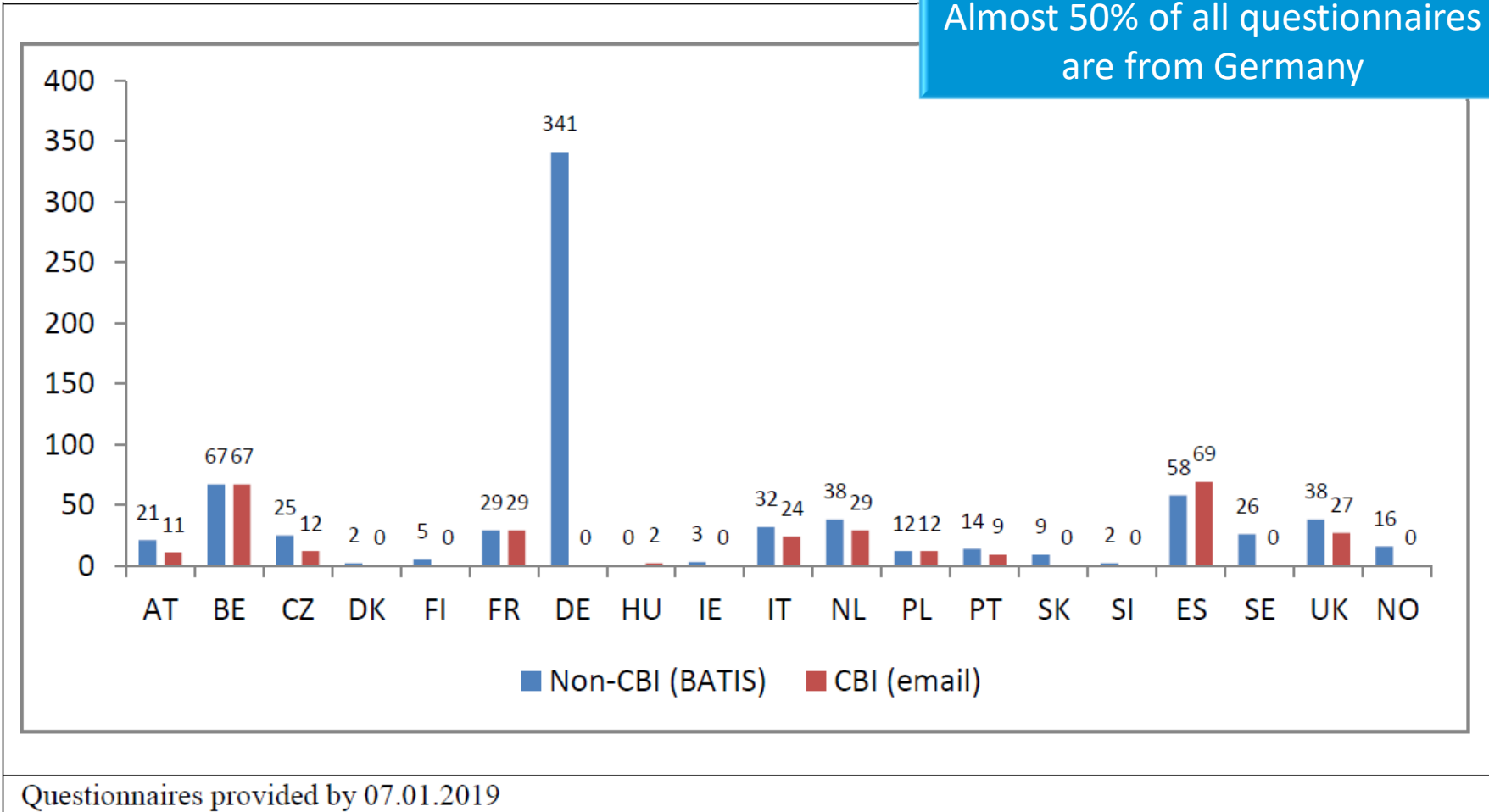
- On January 29th, JRC published the first draft report, updated set of data posted on Feb 13<sup>th</sup>,
- Deadline for submitting questionnaires extended to Feb. 28<sup>th</sup>, 2019
- JRC has received >700 non confidential Q's, >200 confidential Q's
- All non-confidential Q's are on Batis
- >> 300 charts produced by the JRC thus far
- **All current charts and reports are tentative** as there are still more questionnaires coming in

# Collection (tentative)



## Number of Questionnaires

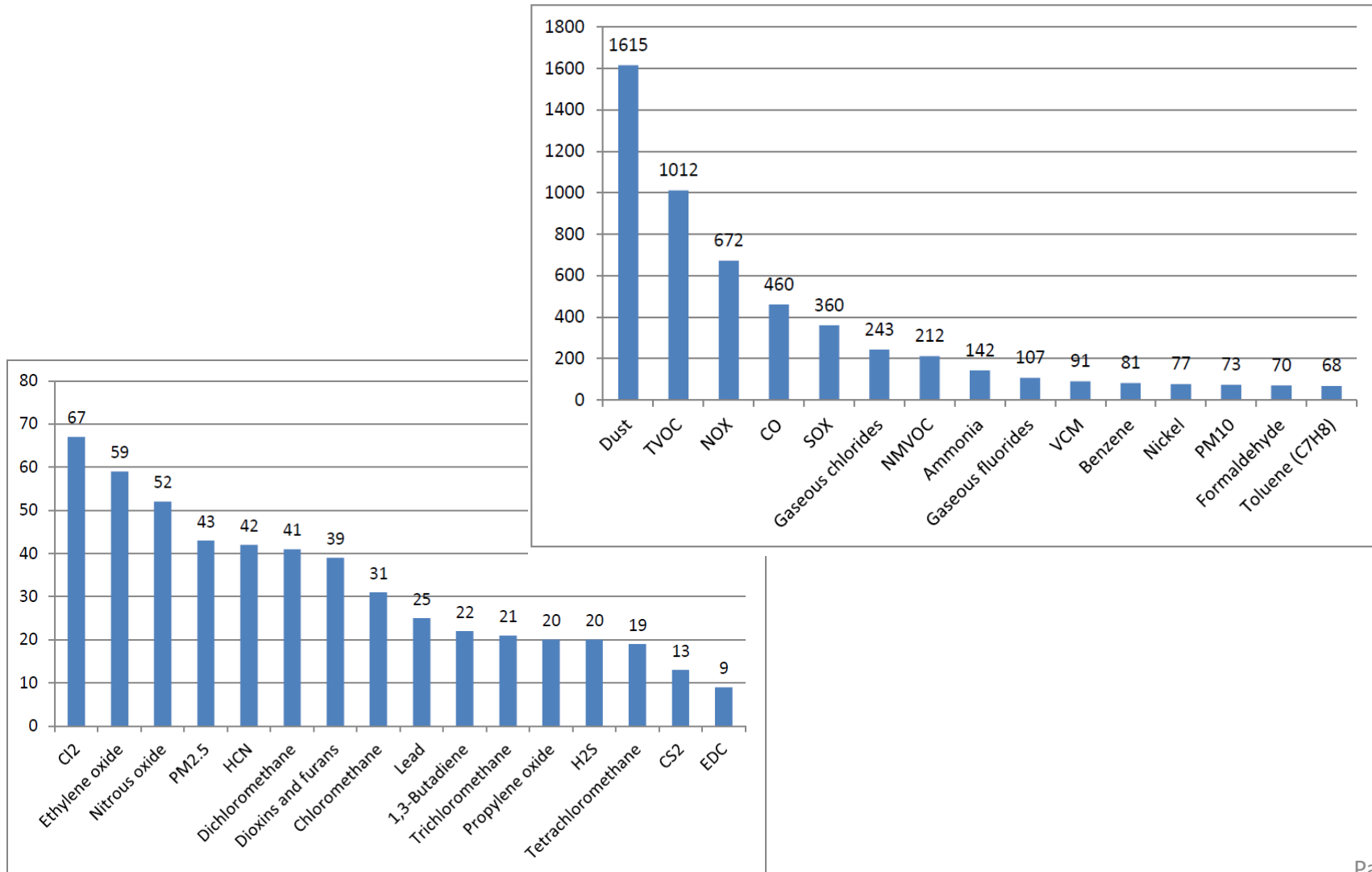
Almost 50% of all questionnaires are from Germany




**Figure 2-2** Number of questionnaires by Member State

# Environmental Issues (tentative)

## Number of channeled emission points





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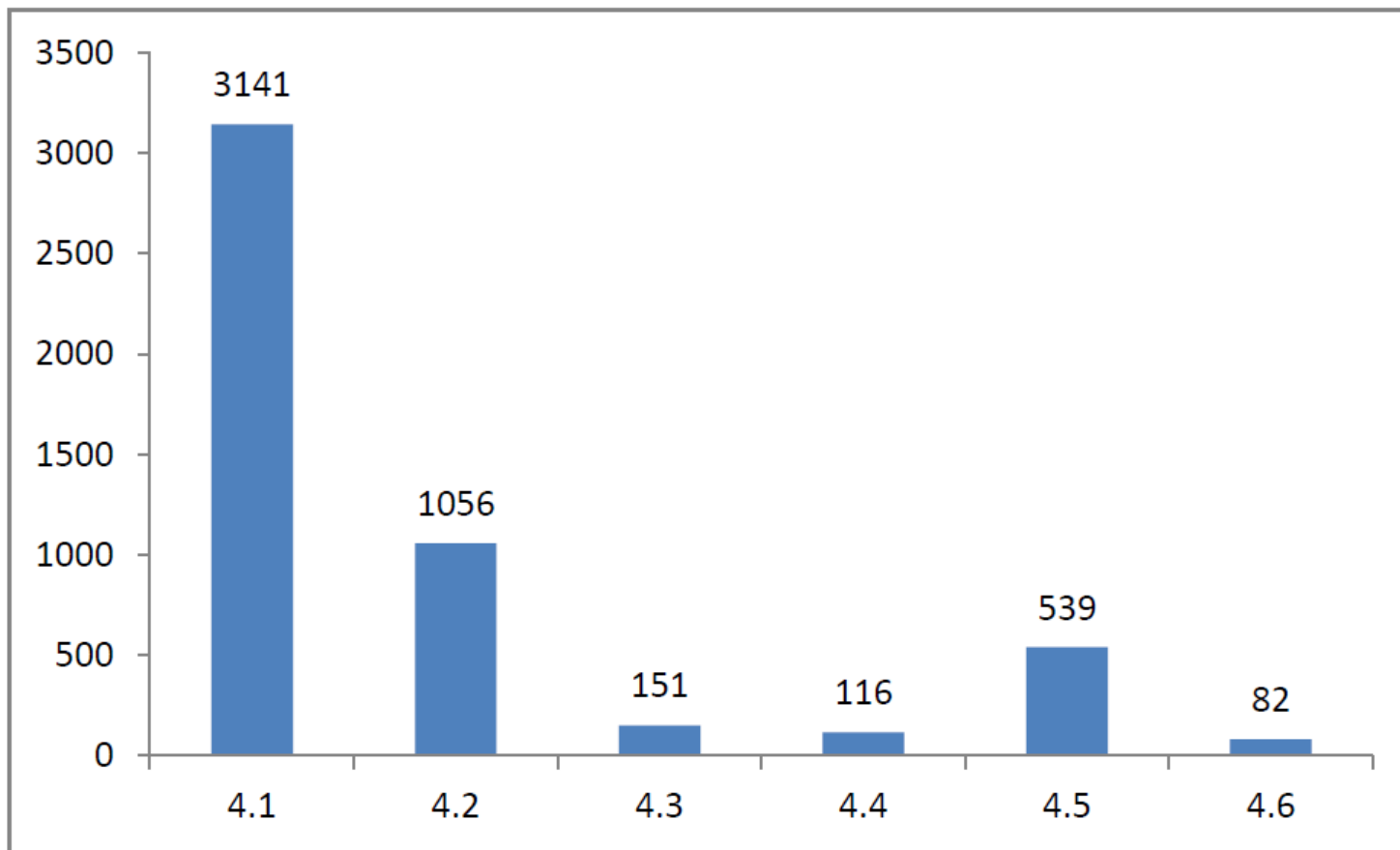
# Status Data Collection (tentative)

## Backup Information

# Collection (tentative)



## Number of IED Installations



Total IED installations in the chemical sector (EU 27), DG ENV, 2015

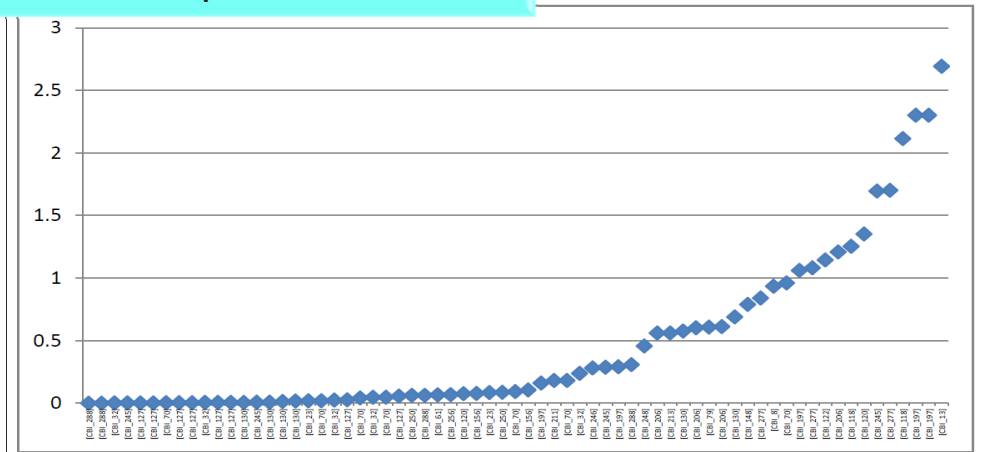
Figure 2-4 Number of IED installations by chemical IED activity



# Data (tentative) Typical Charts provided by JRC

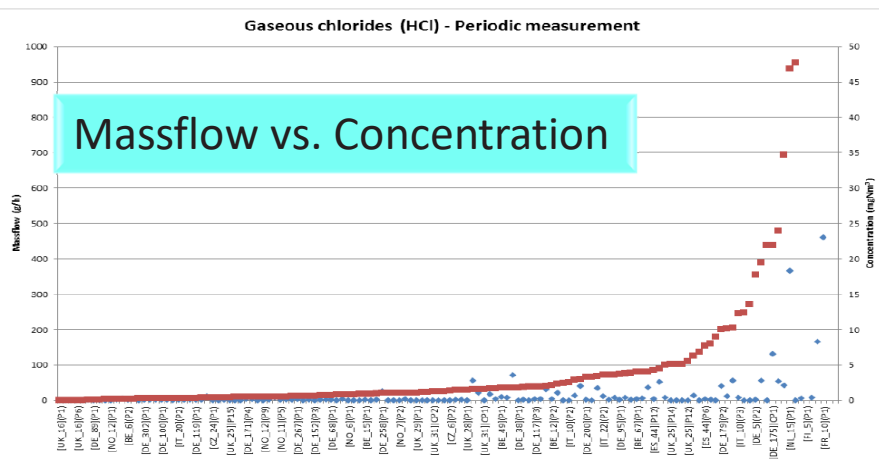


## Emissions per installation



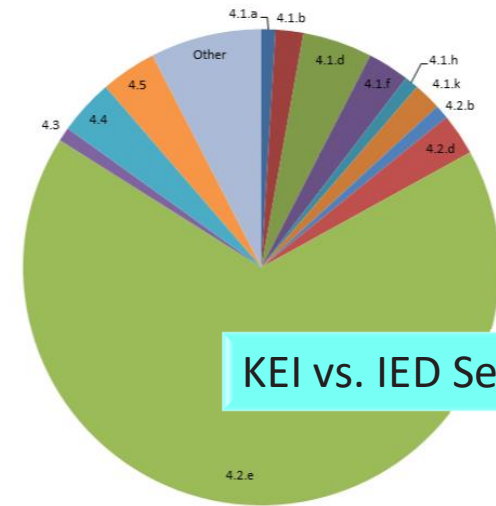
Questionnaires provided by 07.01.2019, based on data set 3.3. Polymers\_CBL.xlsx

Figure 2-20 Polyolefins - specific TVOC emission loads (kg/t product)



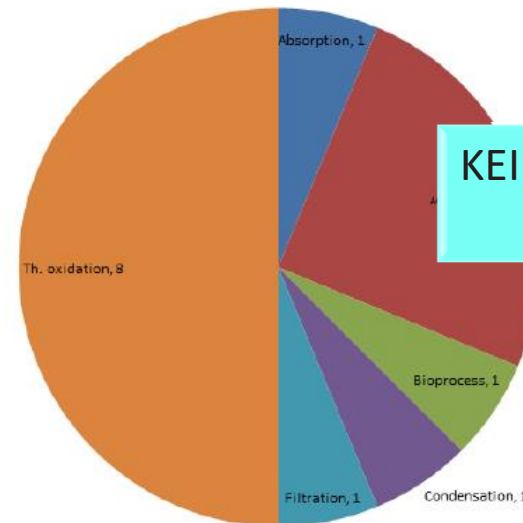
## Massflow vs. Concentration

## Gaseous fluorides (HF)



## KEI vs. IED Sector

## 1,3-Butadiene

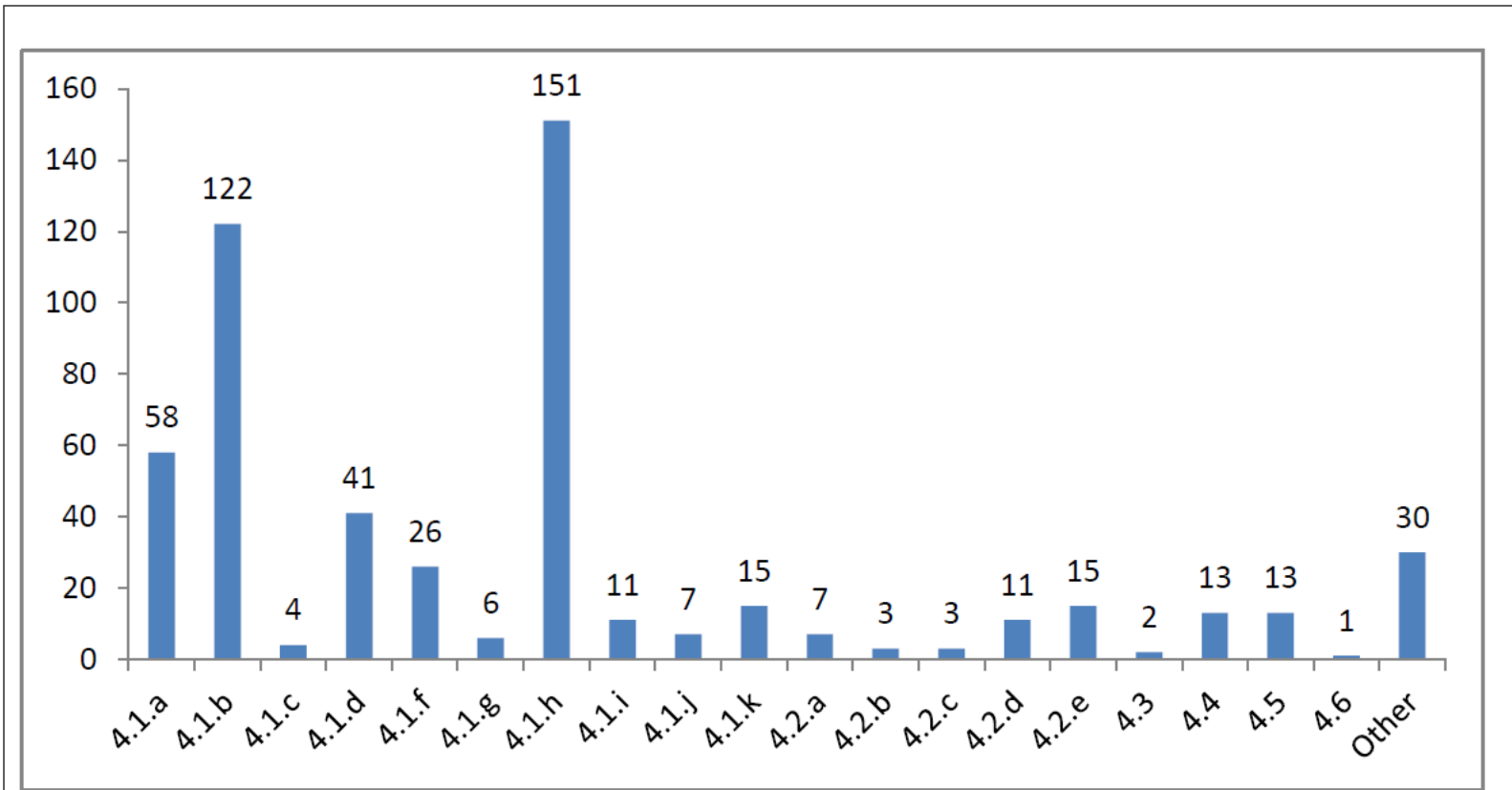


## KEI vs. Abatement Technique

# ons (tentative)



## Number of Questionnaires



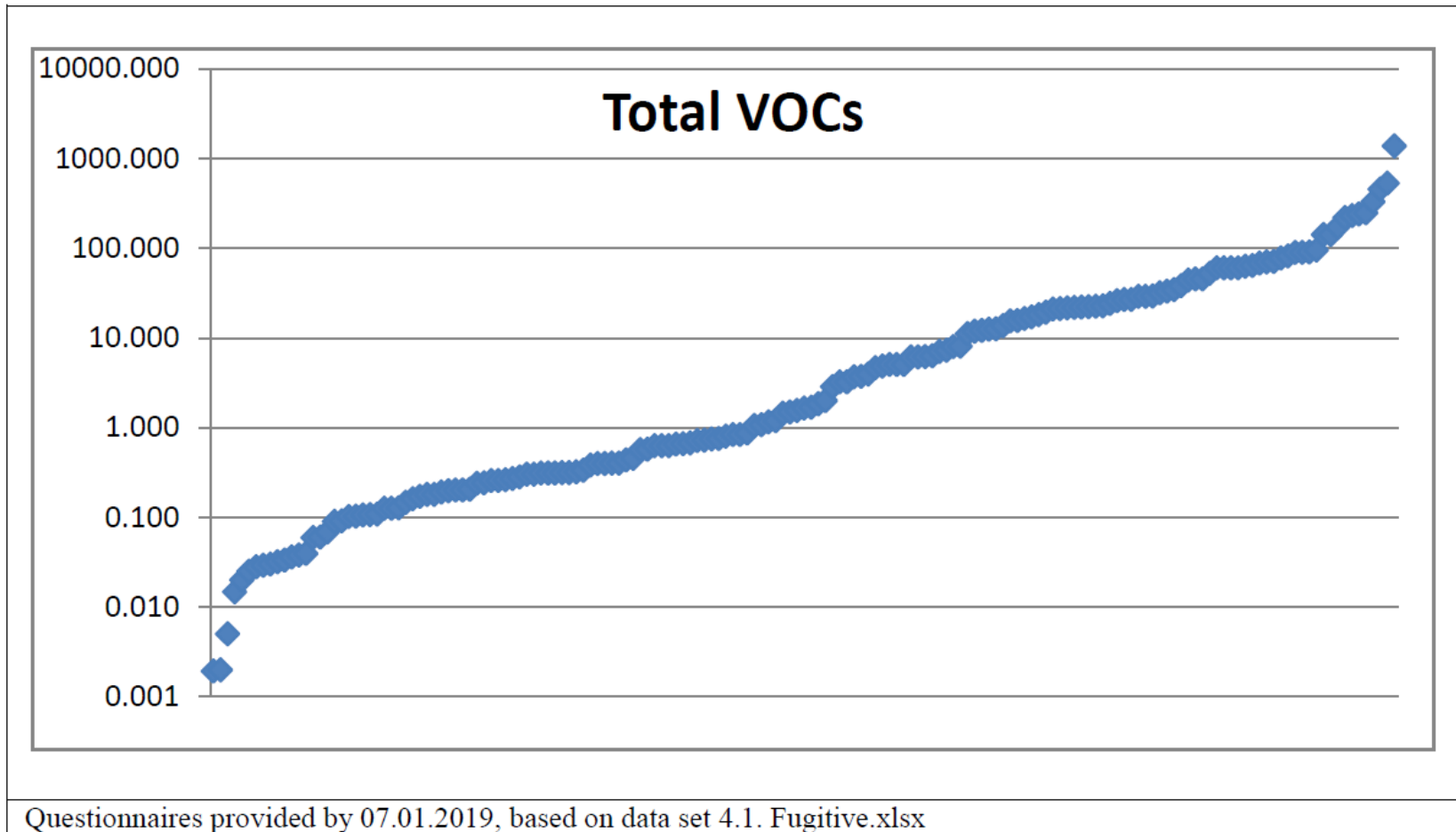
Questionnaires provided by 07.01.2019, based on data set 4.1 Diffuse General.xlsx

**Figure 2-33 Diffuse emissions to air – number of units by main chemical IED activity**

# ons (tentative)



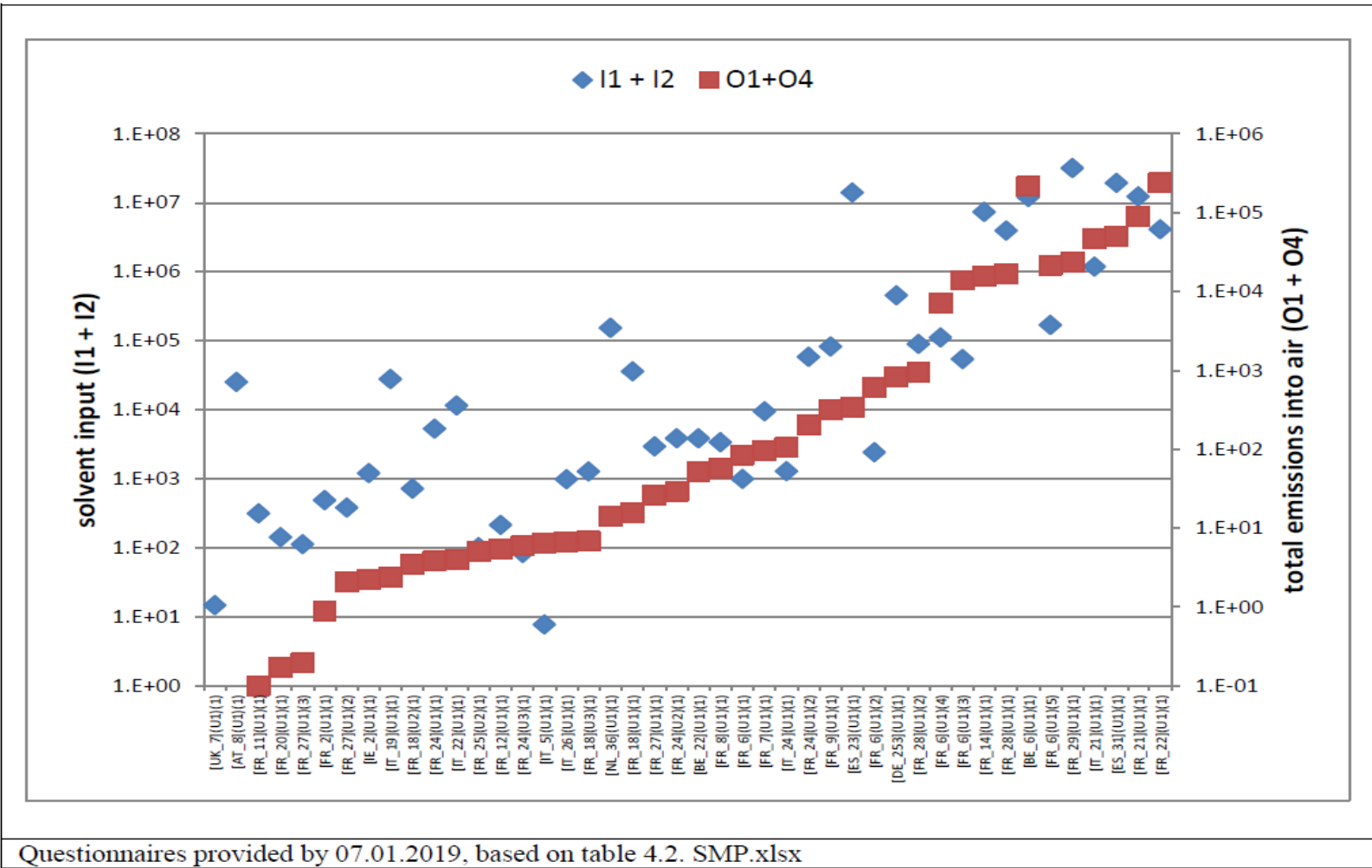
## VOC Emissions



**Figure 2-40 Fugitive emissions to air – Total VOCs (t/yr) by unit**

# Solvent Management Plan (tentative)

## Input vs. Output (emissions)



Questionnaires provided by 07.01.2019, based on table 4.2. SMP.xlsx

Figure 2-71 Solvent management plan - quantity of solvent input versus channelled (O1) and uncaptured (O4) emissions to air (kg/yr)



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# Caretaker

**Volunteers needed**



## Typical tasks/questions

- Explaining why emissions are high (and low, e.g. lower end of the data collection)
- Specificities which can explain outliers (both high and low emissions)
- Background information of the installation and the process, e.g.:
  - Last upgrade; specific situation of a site (e.g. raw materials, interlinkage with other units, permit requirements, quality requirements, customer demands, space restrictions, plant layout ...);
  - Potentially confidential information (utilization, shutdowns, turnarounds ...)
- Cooperation across sector and amongst companies needed (where legally possible)
- → **the caretaker has to be very familiar with the topic he/she is covering!!**
- Cefic, Plastics Europe and PetroChemicals will involve an external support.



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# Timeline WGC



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## Timeline

- “ Workshop data collection June 4/5<sup>th</sup>, Sevilla
- “ Draft 1 “at the end of 2019” (S. Roudier)
- “ Site visits: three companies in Southern France June 17-21<sup>st</sup>
- “ Finalization of the BREF: 2021





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# Other BREFs



# WI BREF

Waste Incineration





## Cefic's summary and view

- “ Final Meeting April 2018. Six delegates from Cefic. Results mostly acceptable.
- “ Split View Assessment was received on Sept 28<sup>th</sup>. SV's into which Cefic was involved were not considered favorably.
- “ Comments were requested by Oct. 26<sup>th</sup>
- “ Cefic decided not to comment but to prepare for the discussion during the Art. 13 Forum.
- “ On Nov 14<sup>th</sup>, five industry associations complained to DG ENV and JRC about e.g. measurement uncertainty, OTNOC (other than normal operating conditions) and EOT (effective operating time). Cefic did not co-sign.
- “ Final draft issued on Dec. 14<sup>th</sup>, 2018.
- “ CEWEP and ESWET sent a letter to DG ENV/JRC on Dec. 29<sup>th</sup>, since the topic of measurement uncertainty was not reflected in Chapter 5 of the Final Draft.
- “ Art 13 Forum was held on 27<sup>th</sup>, 2019. Cefic participated with three delegates
- “ The Forum formed a positive opinion of the BREF
- “ Art. 75 Committee will vote in June 2019

# STS BREF

Surface Treatment with Solvents



## reatment with Solvents) BREF



### Update

- “ Final Meeting December 10-14<sup>th</sup>
- “ Lead by ESVOC, Cefic and other associations cooperated in preparation for the FM
- “ Industry has raised nine Split Views, Cefic is involved in two of them (monitoring of VOCs, rotogravure)
- “ Evaluation of SV's issued on February 27<sup>th</sup>, one rejected, one partially accepted
- “ We currently prepare our comments.
- “ Art. 13 Forum in June 2019



## Short Summary

- “ Cefic was not following the WPC BREF but attended the Final Meeting in Sevilla
- “ BATc's were proposed which would have established a 'ban' on solvents and biocides. Cefic objected and the BAT 35 and BAT 36 were significantly rephrased. UK supported Cefic's position.
- “ Surprisingly low participation of the industry sectors affected by this part of the BREF.

# TXT BREF

BREF on Textiles



## ) BREF



# Cefic's summary and view

- “ Kick Off Meeting June 2018, Cefic attended. TXT is a ‘chemical BREF in disguise’
- “ Based on the input by the BREF IT we focused on flame retardants and the general process of the TXT BREF.
- “ First BREF to use the Ricardo Approach for pre-selection of KEI’s
- “ Questionnaire Nov 15/16<sup>th</sup>, 2018, Cefic attended
- “ Some Cefic members are affected by this BREF as their processes are reaching into the scope of the TXT BREFs. They are informed via CIRFS (European man-made fibers association)
- “ The TWG discussed three drafts of the questionnaire, the number of textile processing in the scope of the 3<sup>rd</sup> draft was vastly reduced.
- “ Data collection has begun, Cefic only as observer



# SA BREF

## Slaughterhouses and Animal Byproducts



# rhouses) BREF



## ➤ Scope

- *6.4 (a). Operating slaughterhouses with a carcass production capacity greater than 50 tonnes per day.*
- *6.5. Disposal or recycling of animal carcasses or animal waste with a treatment capacity exceeding 10 tonnes per day.*
- TWG reactivated, Call for initial positions sent on Dec 17, 2018
- Pre-selection of KEIs via Ricardo Study
- Cefic involved via gelatin sector (GME) → initial position submitted in February 2019
- Position of GME: the manufacture of gelatin is highly diverse, with very different raw materials, different processes and very different uses. Gelatin could be taken out of scope.



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# The Future



## of BREFs



# The current Round of BREF Reviews

## 12<sup>th</sup> Art. 13 Forum (Nov 27<sup>th</sup>, 2018) :

- ONE combined LVIC BREF following the WGC BREF
- NO further chemical BREFs in this round of reviews (e.g. no POL, OFC, SIC BREF)

## of BREFs



# The next Round of BREF Reviews

## 12<sup>th</sup> and 13<sup>th</sup> Art. 13 Forum :

- Members (incl Cefic) favor work on EFS (Emissions from Storage) BREF, some the ICS (Industrial Cooling Systems)
- Less support (Cefic: no) for the ENE (Energy Efficiency) or the ECM (Economics and Cross Media Effects)
- No clear opinion on combination of ICS and ENE (Cefic: against)
- Cefic provided written response
- Several members suggested a workshop



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# News from EU COM

## Art 13 Forum Membership



## Update

- “ The members of the Art. 13 Forum form an opinion of a BREF, upon which the Art. 75 Committee votes
- “ Only members of the this Forum may nominate members to the TWG (Technical Working Group)
- “ Cefic is a member of the Forum since the beginning.
- “ In the 13<sup>th</sup> Forum (February 27<sup>th</sup>, 2019) DG ENV asked for proposals how to deal with the increasing number of associations.

# Forum – the first 12 meetings (1)



	Forum meetings attended												Number of meetings attended:
	09-11	13-09-12	06-06-13	20-09-13	24-09-14	04-12-14	19-10-15	20-10-16	05-04-17	19-12-17	27-11-18		
AeroSpace and Defense Industries Association of Europe (ASD)													0
Afeca - The European Adhesive Tape Association (Afeca)													0
Alcohol Europe - Renewables Ltd (EERL)													0
Europacable													0
European Agri-cooperatives Association (UEPG)													0
European agri-cooperatives (COGECAL)													0
European Banks Association (EBA)													0
European Council of the Paint, Printing Ink and Artists' Colours Industry (CEPE)													0
European Electronics Recyclers Association (EERA)													0
European Federation of Waste Management and Environmental Services (FEAD)													0
European Furniture Industries Confederation (EFIC)													0
European General Galvanizers Association (EGGA)													0
European Institute for Wood Preservation (IEWI)													0
European Metal Packaging External Affairs (Empac E.A.)													0
European Rotogravure Association (ERA)													0
European Solvent Recycler Group (ESRG)													0
European Wood Preservative Manufacturers Group (EWPWG)													0
Flexible Packaging Europe (FPE)													0
International Wool Textile Organisation (IWTO)													0
Plastics Recyclers Europe (PRE)													0
Ships and Maritime Equipment Association (SEA Europe)													0
The Regulatory Assistance Project (RAP)													0
Bureau of International Recycling (BIR)													1
Coalition Clean Bottle (CCB)													1
Elislimed													1
European Compost Network ECN e.V. (ECN)													1
European Fat Processors & Renderers Association (EFPRA)													1
European Plaster and Plasterboard Manufacturers Association (EUROGYPSUM)													1
European Turbine Network (ETN)													1
Fédération Européenne de Fabricants d'Aliments Composés (FEFAC)													1
Fertilizers Europe													1
Intergraf European Federation for Print and Digital Communication (INTERGRAF)													1
The FFI Vegetable Oil and Proteinmeal Industry (FEDIOL)													1
Industrial Minerals Association Europe													1
European Association of Sugar Manufacturers													1
The European Foundry Association													1
Climate Action Network Europe (CAN Europe)													2
European Expanded Clay Association (EXCA)													2
European Industrial Insulation Foundation (EIF)													2
European Recycling Industries' Confederation (EURIC)													2
European Sustainable Packaging Platform (ESPP)													2
GLASS ALLIANCE EUROPE AISBL (GAE)													2
European Recovered Fuel Organisation													2
Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne (B.V.E.C.)													3
Confédération des Associations Nationales de Tanneurs et Mégisiers de la Communauté Européenne (COTANCE)													3
EUROALLIAGES													3
EUROPEAN APPAREL AND TEXTILE CONFEDERATION (EURATEX)													3
European Association for Coal and Lignite (EURACOAL)													3
European Carbon and Graphite Association (ECGA)													3
European Sealing Association (ESA)													3
International Association of Oil & Gas Producers (IOGP)													3
MARCOGAZ (MARCOGAZ)													3
Association for the Catalytic Control of Emissions from Stationary Sources to Air													3
Association des Constructeurs Européens d'Automobiles (ACEA)													3
Centre de liaison des industries transformatrices de viande de l'UE (CLITRAVI)													4
Euroheat & Power (EHP)													4
EUROPEAN COIL COATING ASSOCIATION (ECCA)													4
European Panel Federation (EPF)													4
EU Turbines (EUTurbines)													4
Federation of European Tank Storage Associations (FETSA)													4
FoodDrinkEurope (FoodDrinkEurope)													4
Municipal Waste Europe (MWE)													4
The European Association for the Promotion of Cogeneration (COGEN Europe)													4
Concawe (Concawe)													5
Union Européenne du Commerce du Bétail et des Métiers de la Viande (U.E.C.B.V.)													5
European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines)													6
Cerame-Unik													6
EUROELECTRIC (EUROELECTRIC)													7
European Association of Internal Combustion Engine Manufacturers (EUROMOT)													7
Confederation of European Paper Industries (CEPI)													8
Confederation of European Waste-to-Energy Plants (CEWEP)													8
European Co-Processing Association (EUROPPA)													9
European Power Plant Suppliers Association (EPPSA)													9
European Union for Responsible Incineration and Treatment of Special Waste (Eurits)													9
ORGALIME (ORGALIME)													9
BUSINESS EUROPE													11
CEMBUREAU - The European Cement Association (CEMBUREAU)													11
Eurometals													11
Hazardous Waste Europe (HWE)													11
The European Steel Association (EUROFER)													11
European Chemical Industry Council (Cefic)													12
European Environmental Bureau (EEB)													12
European Suppliers of Waste to Energy Technology (ESWET)													12
FuelsEurope (FuelsEurope) (ex-EUROPA)													12

Cefic attended all twelve Art. 13 Fora

Cefic  
EEB  
ESWET  
FuelsEurope

12  
12  
12  
12

22 attended no meetings

11 attended one meeting

6 attended two meetings

9 attended three meetings

10 attended four meetings

13 attended five to nine meetings

9 attended eleven or twelve meetings





## Cefic Opinion

- “ Since the number of BREFs discussed in the Forum increased, the number of association naturally increases as well
- “ Participation of stakeholders in such Fora is a positive sign of interest in the work of the DG ENV
- “ Why divide the Forum into regular members and those who only attend for a certain BREF? DG ENV should ask all whether they want to continue their participation.
- “ But if the Forum is split, Cefic sees itself in the group of regular members.
- “ IEA members (Industrial Emissions Alliance) will respond individually.



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# News from EU COM

IED Evaluation 2019

## of the IED / Context / Status



- “ DG ENV had verbally announced an **evaluation of the IED** in fall of 2018
- “ Publication of the evaluation roadmap on Nov 6<sup>th</sup>, 2018
- “ Presentation at the Art. 13 Forum on Nov. 27<sup>th</sup>, 2018



Adobe Acrobat  
Document

### First steps taken by CEFIC and VCI

- “ Inform and consult Members / align with Industrial Emissions Alliance (IEA)
  - On Nov 28<sup>th</sup>, IEA agreed that members will send individual responses
  - Industry: EWWG, ESPP, ACEA, CEWEP, Eurofer, Business Europe, VCI, ESWET, EURACOAL, Cembureau, Intergraph, EUCORPO, Cefic, Fuels Europe, EXCA, HWE, Ceramunie, EUROMOT, ECCA, EurEau, CIFF, EuRIC,
  - Others: EEB, Sweden, Austria
- “ Final position were shared via [central public consultations portal](#) by 4<sup>th</sup> of December.
- “ The evaluation will be ‘looking backwards’. This is NOT about improving the IED (yet).

# The IED



## Summary of industry responses

- “ Evaluations must be based on the best available data = pre-conditions to design fit-for-purpose directive
- “ Premature evaluations may only paint a distorted picture of the expected status quo.
- “ Timeline which has been suggested contradicts the report on the “implementation of the [IED] ..” , which DG ENV published in Dec. 2017.
  - Report states that “... to early to see the practical results of the change to the IED ...” (report, pg. 12)
- “ Are sufficient data available to allow for an accurate analysis?
- “ We agree with the conclusion of DG ENV that 50% of the installations have already been reviewed, but this does not mean, conclusions have already been implemented

→ All this leads to question the timeliness of the IED

“ Cefic Subteam has been established

IED Evaluation Team	
Drees	Stefan
Reinold	Andreas
Wiechmann	Benjamin
Dalebout	Emile
Frank	Markus
Moritz	Christoph
Stingl	Thomas
Hess	Monika
Tietz	Cornelia
Caroly	Celine
Cassaghi	Pier-Luigi
Debeuckelaere	Serge
Walters	Pete

## of the IED – Next Steps



- “ A 12-week **online public consultation** to be launched in late 2019 in 23 official EU languages.
- “ Targeted **interviews** with representatives of Member States', industry associations, civil society, and other key stakeholders. Target groups and representatives will be identified based on a **stakeholder mapping** (→ “Cefic is a major stakeholder and will be included”)
- “ A **workshop** to ensure that stakeholder views are correctly understood. First firm date: May 22<sup>nd</sup>, 2019



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# valuation of the IED



## Backup Information



STAFF WORKING DOCUMENT

# Industrial emissions - evaluating the EU rules

In preparation

UPCOMING

Roadmap

FEEDBACK: UPCOMING

Public consultation

Consultation period

Second quarter 2019

FEEDBACK: UPCOMING

Commission adoption

## About this initiative

<b>Summary</b>	EU rules on industrial emissions aim to prevent or reduce pollution and waste generation from certain large industrial installations.  This evaluation will assess how the EU rules are working and whether they benefit the public and industry.
<b>Topic</b>	Environment
<b>Type of act</b>	Staff working document
<b>Category</b>	Evaluation

## Roadmap

FEEDBACK: UPCOMING

### Type

Evaluation and Fitness Check Roadmap

[More about roadmaps.](#)

During several occasions (HAZBREF Workshop, OECD BAT Workshop) DG ENV proclaimed the start of the evaluation of IED in 2019

# f the IED – Cefic position



With particular view onto the chemical Sector, we note:

- “ The majority of chemical installations is covered by the WGC BREF for which the data collection has just begun; the implementation of conclusions of the LVOC BREF is still ongoing. The evaluation of the sector for large inorganic chemicals has not even been started.
- “ The WGC BREF will not be finished before 2021 and as such, BATs will not be fully implemented before 2025;
- “ Hence, an evaluation starting now cannot consider the implementation in the majority of chemical plants in Europe.
- “ It would be unwise to neglect the input of one of the largest industrial sectors in Europe.

With regards to the overall BREF Process:

- “ The BREF process has significantly improvement in the most recent years (better frontloading; increased and improved workshops and data collection) but we are just beginning the reap the fruits of these improvements
- “ Some essential questions, e.g. the derivation of BAT-AELs are still not answered (in fact it was put on hold as long as the court case on the LCP BREF continues).

Conclusion:

- “ VCI/Cefic suggest to postpone the evaluation until most of the IED sites in Europe have implanted decisions concluded under the auspices of the IED





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# News from EU COM

HAZBREF

## Project

# Cefic's summary and view

HAZBREF: Hazardous Industrial chemicals in the IED BREF  
IED: Industrial Emissions Directive  
Water/Waste Framework Directives  
POP: Persistent Organic Pollutants  
HELCOM: Helsinki Commission (Baltic Marine Environment  
Protection Commission)



- “ Kick Off Meeting in Helsinki, March 19/20, 2018
- “ Project seems to strive for significant overlap between IED and e.g. Waste FD, Water FD, POP Regulation, REACH and HELCOM
- “ Workshop WP3, Berlin September 25, 2018
  - “ Report on WP3 (“Policy Improvement”) /No input from Industry requested
  - “ In parts harsh statements about DG ENV/EIPPCB (e.g: “Lack of knowledge and mutual information” between DG’s, EIPPCB and ECHA)
- “ In parts strong critique by DG ENV → Report on WP3 under revision; revised version expected by Jan/Feb 2019
- “ Next workshop in Tallinn, May 21/22, 2019, Cefic will attend
- “ Results of the HAZBREF can have a bearing on the IED evaluation



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# News from EU COM

## Ricardo Study on Key Environmental Issues (KEIs)

## Environmental Issues (KEIs)



### Study by Ricardo

- “ In order to streamline the BREF process, better frontloading is required
- “ Pre-selection of KEIs is an essential part to save time
- “ In 2017 DG ENV contracted Ricardo to find a way
- “ Industry was involved but input was not much considered
- “ Results applied for the next four BREFs (TXT, SA, SF (Smitheries and Foundries) and CER (Ceramics))
- “ Cefic critiqued the focus on literature and the lack of data/quantifiable input
- “ However, the pre-selection has its merits!



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# ental Issues (KEIs)



## Study by Ricardo

Backup information

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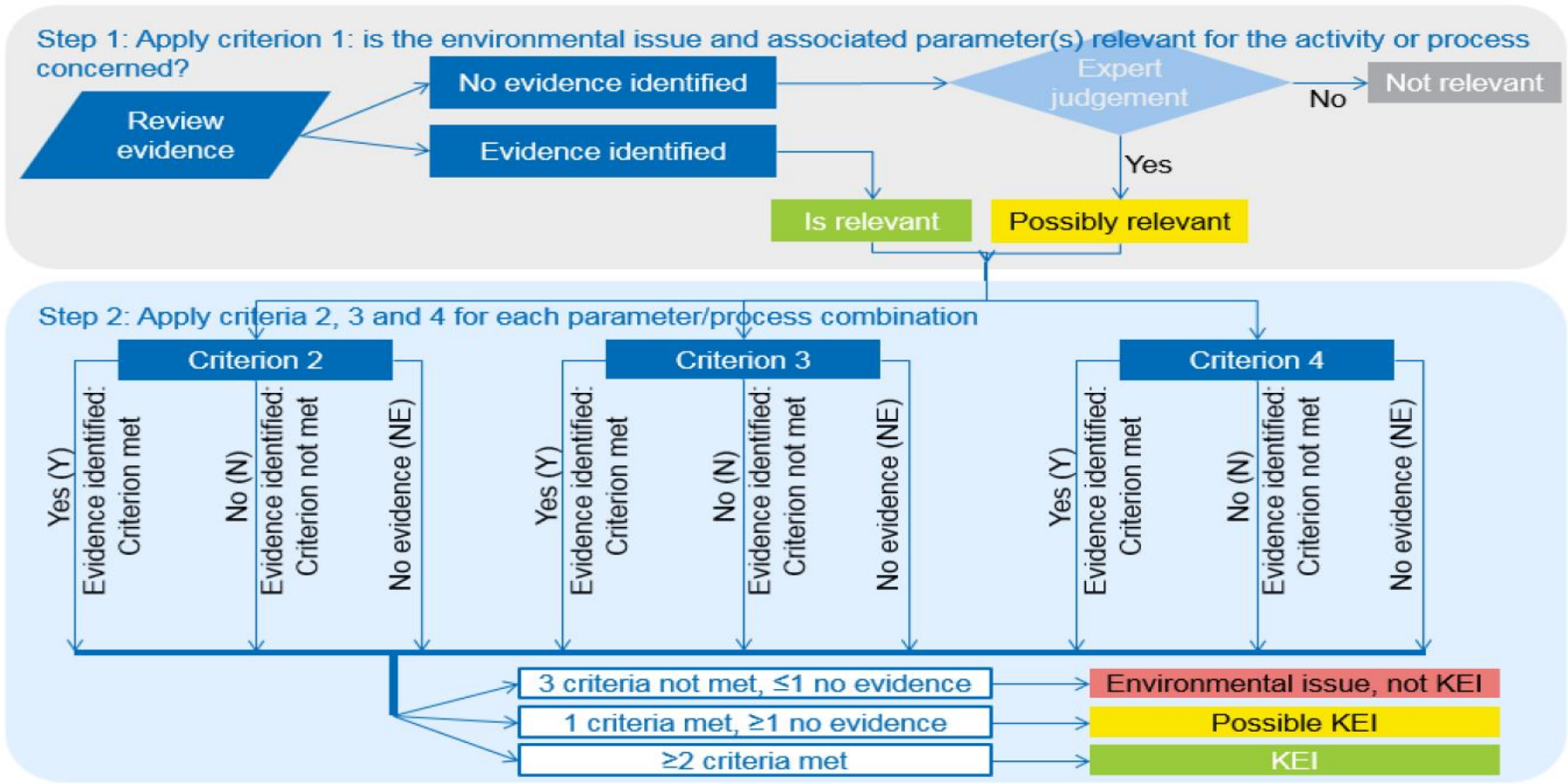
## Ricardo Study

Criterion 1: are the environmental issues and associated parameters relevant for the activity or process concerned?

Criterion 2: Is the industrial process and its pollution and consumption a significant part of industrial pollution and consumption in the EU, currently or trending?

Criterion 3: the potential for identifying new or additional techniques that would further significantly reduce pollution; and

Criterion 4: the potential for defining BAT-AELs and BAT-AEPLs that would significantly improve the level of protection for the environment.





# Ricardo Study – Example: TXT BREF

Environmental issue	Parameter	Spinning Preparation for cotton fibres	Fellmongering	Spinning Preparation for wool fibres	Production of man-made filaments & fibres	Retting	Spinning	Winding, reeling and covering	Yarn steaming, setting, moistening and coating	Texturising, bulking and crimping	Doubling and twisting
	Amines										
	Ammonia		r339								
	Asbestos										
	Biologically active substances										
	Carbon monoxide	r318		r318			r318			r318	r318
	Chlorine and its compounds										
	Cyanides										
	Dust	r107		r345			r345				

Partial excerpt only!



# Ricardo Study

Suggested KEI classification for parameters relevant for spinning						
Issue	Parameter	Root cause	C2	C3	C4	Proposal
Emissions to air	Carbon Monoxide	Mineral oil lubricants (that may contain PAH)	C2 (r107: p3)	NE	NE	Possible KEI
	Odour					Possible KEI
	Dust		C2 (r350: table 3)	NE	NE	Possible KEI
	Dioxins and furans	Various auxiliaries	NE	NE	NE	Not KEI
	Substances and mixtures which have been proven or are suspected to possess carcinogenic or mutagenic properties (di-isocyanates, N,N-dimethylacetamide)	Mineral oil lubricants (that may contain PAH)	C2 (r107: p3)		C4 (r300: p54)	KEI
	Polychlorinated biphenyls		NE	NE	NE	Not KEI
	VOCs	various	C2 (r107: p3)	NE	NE	Possible KEI

Partial excerpt only!





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# Thank you !

