

ESPP input:

EU public consultation on the inception impact assessment for the Industrial Emissions Directive

Deadline = 21st April 2020 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12306-EU-rules-on-industrial-emissions-revision>

4000 characters (inc spaces) plus possibility to upload a document

ESPP supports the suggested widening of the IED scope to cover intensive cattle farms and aquaculture, in coherence with the inclusion today of large pig and poultry farms.

ESPP supports that the IED process should better take into account EU Circular Economy objectives. BREFS should better integrate recycling, both use of secondary raw materials in production, recovery of materials in processes, and recycling of waste or by-product streams, as well as reducing raw materials consumption. This should particularly target EU Critical Raw Materials.

Resource efficiency and recycling, including nutrients, should be integrated into the Key Environmental Indicators (KEIs) for BAT

As a member of the IED Forum, we see as challenges to ensure update of the BAT BREF documents to take into account technical progress. The BREF process is slow and demanding of human resources. Perhaps the formal BAT requirements could be separated from the examples, emerging processes and explanative texts. These have an important role in promoting progress and innovation, so need to be flexible and up-to-date. Possibly the current formal adoption process could be maintained for the BREF specifications, but the examples etc could be moved to a separate non-regulatory document, with status similar to a Commission Guidance, enabling more flexible and frequent update.

The role of the horizontal BREFs (including the proposal for a horizontal “Resource Efficiency” BREF) needs to be clarified. Perhaps these could have a role for application to concerned installations not covered by current BREF categories? Or they could be reorientated as guidance/innovation documents and made more flexible for permanent update.

The European Sustainable Phosphorus Platform (ESPP) promotes the implementation of sustainable phosphorus management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation, funded by its members. The Platform has over 40 members from a range of different industries (water and waste companies, mineral and organic fertilisers, chemicals, recycling technologies), knowledge institutes and public establishments.

www.phosphorusplatform.eu Email info@phosphorusplatform.eu