

Evaluation of the Industrial Emissions Directive

Fields marked with * are mandatory.

Introduction

The Industrial Emissions Directive 2010/75/EU (IED) is the primary instrument in place at the EU level to control and mitigate the environmental and human health impacts arising from industrial emissions in the EU. The IED regulates around 50 000 of the largest industrial installations covering a wide range of agro-industrial sectors. These include: power plants, refineries, and production of steel, non-ferrous metals, cement, lime, glass, chemicals, pulp and paper, food and drink as well as waste treatment and incineration and the intensive rearing of pigs and poultry. The general objective of the IED is to prevent, reduce and eliminate as far as possible emissions into air, water and land arising from industrial activities.

The IED aims to ensure that industrial emissions are dealt with in an integrated way and minimised. Permits must be issued for these installations by national authorities with conditions based on the use of Best Available Techniques (BAT). To ensure a comparable EU approach, sectoral BAT Reference Documents (BREFs) are produced through an EU level techno-economic assessment carried out by a Technical Working Group of the Commission, Member States, industry and civil society. The BAT Conclusions are adopted as Commission implementing acts.

The IED is now undergoing an evaluation against the following five key evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value, and this public consultation is part of this evaluation process. Your responses provided to this questionnaire will be analysed and will feed into the overall IED evaluation process.

The roadmap of the evaluation process can be found [here](#).

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish

- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

India

* Surname

Redrup

* Email (this won't be published)

INDIA.REDRUP@ENERGY-UK.ORG.UK

* Organisation name

255 character(s) maximum

Energy UK

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

13457582538-68

* Country of origin

Please add your country of origin, or that of your organisation.

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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Samoa |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> San Marino |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Senegal |
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| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Ethiopia | <input type="radio"/> Mali | <input type="radio"/> Sierra Leone |
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| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Somalia |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> South Africa |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Korea |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Sudan |

- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- North Korea
- Northern Mariana Islands
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Swaziland
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
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- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

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| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Puerto Rico | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Qatar | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Réunion | <input type="radio"/> Vatican City |
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| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Rwanda | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Lucia | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Martin | |

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Anonymous**
Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.
- Public**
Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

General awareness of industrial emissions and the measures to tackle them

This section seeks to gather information on the general level of knowledge of emissions from large industrial installations, their evolution over time, and the measures in place to address them. It does not require an in-depth knowledge of the Industrial Emissions Directive.

Please select the answer which best represents your views.

1. To what extent do large industrial installations operate in your places of interest (place where you live, work or study)?

- No industrial activity (skip questions 2 to 5)
- Low industrial activity
- Some industrial activity
- High industrial activity
- Very high industrial activity
- Do not know

2. To what extent do activities of large industrial installations located in your places of interest (place where you live, work or study) have an impact on the following environmental aspects?

	No impact at all	Some impact	Significant impact	Very significant impact	Do not know
Air Quality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Quality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumption of natural resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil contamination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste generation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. To what extent do activities of large industrial installations located in your places of interest (place where you live, work or study) have an impact on human health?

- No impact at all
- Limited impact
- Some impact
- Significant impact
- Very significant impact
- Do not know

4. Do you know which authority is responsible for granting and enforcing permits for large industrial installations in your places of interest (place where you live, work or study)?

- Yes, I know.
- No, I don't know.

5. Do you know how you can participate in permitting decisions for large industrial installations in your places of interest (place where you live, work or study)?

- Yes, I know.
- No, I don't know.

6. Do you have access to sufficient information on the level of environmental impacts of large industrial installations?

- No information at all
- Limited information
- Some information
- Sufficient information
- Very detailed information
- Do not know

7. In your opinion, has the level of environmental impacts from large industrial installations in the last 5 years:

- Significantly decreased
- Decreased somewhat
- Stayed the same
- Increased somewhat
- Significantly increased
- Do not know

8. In your opinion, the availability of information on the level of emissions from large industrial installations in the last 5 years has:

- Significantly increased
- Increased somewhat
- Stayed the same
- Decreased somewhat
- Significantly decreased
- Do not know

9. To what extent are you familiar with the following?

	Extremely familiar	Very familiar	Moderately familiar	Slightly familiar	Not familiar
EU legislation concerning industrial emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process used to establish permit conditions by local, regional or national competent authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The role of Best Available Techniques in permits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The environmental requirements set in permits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of emissions information on installations (for example from the European Pollutant Release and Transfer Register (E-PRTR*) and public registers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Enforcement processes and use of penalties	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(*) <https://prtr.eea.europa.eu/#/home>

Specialised views on the functioning of the Industrial Emissions Directive

This section focuses on gathering more in-depth views about the functioning of the permitting system governed by the Industrial Emissions Directive and requires a certain level of corresponding knowledge. The questions are largely structured around the 5 evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value. Questions 10 to 20 can be skipped by the general public.

Please select the answer which best represents your views and/or indicate the extent to which you agree with the statements in the following questions.

10. To what extent do you agree that the Industrial Emissions Directive (including its secondary legislation, i.e. regulations and decisions) has contributed to the following?:

	Stongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To reducing environmental impacts arising from large industrial activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To a more effective enforcement of permit conditions to control environmental impacts from large industrial installations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure an EU level playing field for EU Members States and operators of large industrial installations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. To what extent do you agree that the regular updating of BREFs and permits (choose below) under the Industrial Emissions Directive has encouraged the development and deployment of better techniques to prevent and control environmental impacts from large industrial installations?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
BREFs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Permits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. To what extent do you agree that the process to draw up and regularly review BREFs:

	I am not familiar with /aware of the BREF process	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Is effective in identifying techniques for achieving a high level of environmental protection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allows both costs and benefits to be sufficiently considered in identifying the best available techniques	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Captures new developments in techniques	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. To what extent is the cost to industrial installations of complying with permit conditions based on the use of BAT acceptable in view of the benefits?

- I am not familiar with/aware of the costs
- Extremely acceptable
- Very acceptable
- Moderately acceptable
- Slightly acceptable
- Not acceptable
- Do not know

14. To what extent are permits issued to large industrial installations based on the IED and BREFs effective in controlling the environmental impacts of those installations?

- Extremely effective
- Very effective
- Moderately effective
- Slightly effective
- Not effective
- Do not know

15. To what extent do you agree that the provisions of the IED on the following (permits, enforcement and access to information) have led to more effective control of the environmental impacts of large industrial installations?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Permits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to information	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

16. To what extent do you agree that the IED addresses the following:

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most relevant pollutants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most polluting agro-industrial sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. To what extent do you agree that the process to draw up and regularly review BREFs addresses the following?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most relevant pollutants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most polluting agro-industrial sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. To what extent is the IED internally consistent (no contradictions and no overlaps) among its chapters and provisions?

- Extremely consistent
- Very consistent
- Moderately consistent
- Slightly consistent
- Not consistent
- Do not know

19. To what extent is the IED coherent with the following EU policies?

	Extremely coherent	Very coherent	Moderately coherent	Slightly coherent	Not coherent	Do not know
Climate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Quality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Quality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. To what extent do you agree that legislation to regulate environmental impacts of large industrial installations at the EU level, as opposed to national level, helps the following?

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	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To better protect human health and the environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure that competent national authorities address industrial pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To avoid competition on environmental standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other comments

21. Please include any further information that you believe would be useful for this evaluation of the Industrial Emissions Directive.

Response to the Evaluation of the Industrial Emissions Directive (IED)
4 Sept 2019

About Energy UK

Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership covers over 90% of both UK power generation and the energy supply market for UK homes. We represent the diverse nature of the UK's energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, who now make up over half of our membership.

Our members turn energy sources into electricity for over 27 million homes and every business in Britain. Over 680,000 people in every corner of the country rely on the sector for their jobs, with many of our members providing long-term employment as well as quality apprenticeships and training for those starting their careers. The energy industry invests over £12.5bn annually, delivers around £84bn in economic activity through its supply chain and interaction with other sectors, and pays £6bn in tax to HM Treasury.

Key messages:

Emissions from the power sector - context

The UK power sector continues to undergo a large transition towards decarbonisation and as well as the sector's large reductions in CO₂ there have also been large reductions in the non-CO₂ emissions covered by the IED and its predecessor legislation. For example, the sector has achieved a 97% reduction in SO₂ emissions between 2000 and 2017, a 73% cut in NO_x emissions and reductions in PM₁₀ of 90% over the same period. Alongside the policies driving decarbonisation, the IED provides a key part of the overall regulatory framework by ensuring that high standards of emissions abatement are achieved.

Over the next decade, the recently agreed source-specific European legislation for the energy sector (namely the ongoing implementation of the Best Available Techniques Reference Document for Large Combustion Plants (BREF LCP) and the Medium Combustion Plant (MCP) Directive) will lead to further significant emission reductions. The power sector is committed to supporting the clean energy transition and with the right frameworks in place to achieve a net zero electricity mix in the UK before 2050. Therefore, the trend of reducing emissions is set to continue over the next decade, driven by the implementation of wider decarbonisation and energy policy, the continued desire to invest in low carbon generation by UK power companies and the industrial emissions/air quality framework. The power sector activities also fall under the scope of other pieces of legislation regarding e.g. its emissions to water or its by-products, residues and wastes and this legislation also allows for a reduction in the impact of LCP on the environment and health.

Coherence between policies and better implementation

Energy UK fully supports and understands the need for an ambitious industrial emissions policy in Europe, but coherence is needed with broader energy and climate policies to ensure best overall outcomes are delivered in a cost-effective way.

We would like to highlight that the Commission Implementing Decision (EU) 2017/1442 of 31 July 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for large combustion plants was published in August 2017 and that Member States have four years (i.e. 2021) to review and if necessary update permits for LCPs. The current BREF for LCPs covers the vast majority of the UK fossil fuel electricity generation capacity and the process of updating permits to implement the BAT conclusions is still underway. At this stage, it is therefore premature to assess the full impact of the implementation of the LCP BREF, as a key piece of the IED framework for LCPs.

In terms of the BREF process itself, in our view the areas to build on are:

- ensuring that there is a clear and transparent methodology for deriving emission limits;
- ensuring proper consideration of the economic impacts relative to the environmental benefits taking into account the role and lifetime of plant;
- stronger consideration of the overall environmental impact including cross-media impacts and trade-offs between pollutants.

Finally, as an overall comment we note that as the IED contains provisions that ensure that BAT is regularly reviewed and updated as well as a general provision that Environmental Quality Standards are met in our view the IED remains a robust piece of legislation. Given these “future-proofing” provisions it is hard to see any environmental benefits from a revision at a time where policy stability with respect to industrial emissions is required to support the decarbonisation transition. This is particularly the case for our sector when the newly agreed BAT Conclusions required by the IED have yet to be implemented.

Contact

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