

# IED-EPRTTR-Revision-OPC-2020

Fields marked with \* are mandatory.

## Survey for Public Consultation

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### Introduction: European Green Deal, and the Role of Industry in Cleaning and Greening the EU

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The European Green Deal sets the overall strategy on dealing with climate-related and wider environmental challenges whilst achieving “greener” EU economic growth.

In parallel, the Industrial Strategy for Europe highlights the need for new processes and technologies, innovation and investment to strengthen our industrial competitiveness and facilitate industry’s shift to a climate neutral, clean and circular economy.

Since 1996, integrated pollution prevention and control (IPPC) methodologies and legislation has been the way in which the EU’s Member States have issued environmental permits to govern the operation of larger industrial plants. The latest version of the EU legal rules is called the Industrial Emission Directive (IED) - Directive 2010/75/EU. The IED is effective in controlling pollution to air, water and soil from larger industrial and agricultural plants in an integrated way, and in pushing forward the incorporation of innovative “Best Available Techniques” [1]

Working hand-in-hand with the IED, the European Pollutant Release and Transfer Register (E-PRTR) Regulation (EC) 166/2006 (as amended) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

#### **The new European Green Deal and the Zero Pollution Ambition for Europe**

The European Green Deal, adopted in December 2019, seeks to go way beyond the current policies to control emissions to air, water and soil. It sets out a long-term pathway to 2050, to ensure a climate-neutral, clean and circular economy, optimising waste management and minimising pollution over this timeframe.

The Green Deal commits inter alia to:

1. adopting an action plan towards a zero pollution ambition. Separate consultations on the Zero Pollution Action Plan initiative are ongoing.
2. revising EU measures to address pollution from large industrial plants, including both the IED and the E-

PRTR, to:

- Look at the sectoral scope of the legislation and at how to make it fully consistent with climate, energy and circular economy policies
- Ensure that industry sectors maintain their role in improving the EU's environment
- Increase the take-up by industry and agricultural sectors of novel and proven techniques to create a more sustainable EU economy, at the same time as achieving a cleaner environment that improves public health
- Improve public access to environmental information.

The scope of the revisions mentioned above are summarised in two brief documents: the IED inception impact assessment and the E-PRTR inception impact assessment.

### **The IED (Industrial Emissions Directive) – in more detail**

The IED controls the environmental impacts of over 50,000 of the larger-scale agricultural and industrial activities in an integrated manner, to achieve a high level of protection of the environment. Activities regulated by the IED include power plants, refineries, waste treatment and incineration, production of steel, non-ferrous metals, cement, lime, glass, chemicals, ceramics, pulp and paper, food and drink, as well as the intensive rearing of pigs and poultry.

National authorities are obliged to issue permits for plants conducting activities under the scope of the IED, with permit conditions based on the use of Best Available Techniques (BAT). To ensure a consistent EU approach, sectoral BAT reference documents (BREFs) – tailored to each agricultural or industrial activity - are produced via EU-wide assessment with Technical Working Groups whose members include environmental and civil society NGOs, industry associations, EU Member States and the European Commission. So-called 'BAT conclusions' derived from these discussions, are then formally adopted into EU law and are binding. EU Member States' permitting authorities must use these as the reference when setting permit conditions.

**The IED was evaluated earlier in 2020** to check how it was functioning. Findings from this evaluation included:

- Pollution is still occurring across the EU from large (agro)industrial plants (including emissions to air, water and soil; and use of harmful substances)
- Extending the IED to other sectors or activities could be appropriate, or thresholds at which plants become subject to the IED might be changed, in order to reduce significant pollution
- Member States are implementing EU IED requirements in a heterogeneous manner, including the stricter BAT conclusions measures. The result is that the environmental ambition varies across the EU's Member States
- Further efforts could be made to support the decarbonisation efforts of large-scale industries and agricultural activities as a whole
- Large industrial and agricultural facilities could contribute more to a circular economy, and their exploitation of natural resources could be reduced

- The IED may be able to more proactively promote new production processes, technologies and innovation
- Greater coherence and synergies with other EU legislation (e.g., the Emissions Trading System, the Landfill Directive and waste management opportunities) could be exploited.
- There is insufficient public access to information, participation in decision making and access to justice with regard to permitting decisions and revisions.

### **The European Pollutant Release and Transfer Register (E-PRTR)**

The E-PRTR is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The register contains data reported annually by some 30,000 industrial facilities covering 65 economic activities across Europe, and complements the IED. It should be noted that some activities are covered by E-PRTR but not by IED (e.g. mining).

The E-PRTR registry contains details at Member State level of plants and related pollution/ discharges information throughout the EU, also enabling searches on individual or groups of pollutants to be made, including heavy metals, pesticides, greenhouse gases and dioxins for the year 2007 onwards. Some information on releases from diffuse sources is also available. Member States update the register's website annually.

The E-PRTR contributes to transparency and public participation in environmental decision-making. It implements, for the European Union, the UNECE (United Nations Economic Commission for Europe) PRTR Protocol to the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

An evaluation of the E-PRTR concluded in 2016 that whilst the E-PRTR Regulation was very much fit for purpose, some elements could be improved, e.g. in areas where there were opportunities for simplification and cost savings, and where the scope of the current Regulation could be extended to improve coherence with the following policy areas:

- the IED (for some industrial activity definitions, and for the Large Combustion Plant inventory)
- EU waste law (e.g. level of detail required for waste types when reporting transfers, and risk of discrepancies in reporting, depending on whether the waste is being treated, or disposed of)
- the Emissions Trading System (and differences in activities and thresholds)
- water legislation (and emission to water reporting requirements); and
- the INSPIRE (INfrastructure for SPatial InfoRmation in Europe) directive, relating to the interoperability of spatial datasets.

### **Your role – what you can do to help us ... and the EU**

The purpose of this consultation is to gather the views of the public on revising the IED and E-PRTR.

First of all, we would like to enlist your help in understanding existing problems better. Secondly, we are trying to identify policy options to address these problems efficiently, clearly and coherently.

We are conducting the work on Impact Assessment to possibly revise the IED and the E-PRTR in parallel, to make the process more coherent and streamlined.

## **Content of this consultation**

The consultation is divided into three parts:

- Part 1 - asks for some information about you (such as which country you come from).
- Part 2 - aims to gather information on general awareness and views of the impact of large (agro) industrial plants on the environment and the measures to manage it. The questions are aimed at the general public, and do not require any particular specialist knowledge, solely an interest in the area.
- Part 3 - contains more detailed questions – it is addressed to those persons with more experience/ expertise in the area, who may wish to comment in greater depth on the impact of large (agro) industrial plants on the environment and the measures to manage it in the revisions under consideration. (Please also note that there will be also be a follow-on Targeted Stakeholder Survey for experts, and other general/ specific consultation opportunities via stakeholder meetings – see below).

Part 3 gives you the opportunity to let us know if you wish to take part in the follow-on Targeted Stakeholder Survey, and also to join in more detailed focus groups, interviews and stakeholder consultations.

At the end of the questionnaire, you are also able to upload one document (e.g. technical information, Position Paper, etc) supporting and detailing your views. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

All responses to this consultation will be assessed and the results will be included in the analysis supporting our next steps. We will also produce a stand-alone factual summary on the input received, as well as a more detailed analysis of all consultation activities, which will be made available on the “Better Regulation” portal of the European Commission’s website in the 2nd Quarter of 2021. More detailed material gathered during the consultation exercise may be uploaded to the publicly-available area of the Commission’s “CIRCABC” library, and links to this will be provided to the general public.

If you have any questions, please contact the European Commission at this dedicated email address: **[ENV-IED-REVISION@ec.europa.eu](mailto:ENV-IED-REVISION@ec.europa.eu)**

Your opinion matters, and we are very grateful to you for taking the time to answer these questions.

[1] Defined in Article 3 (10) of Directive 2010/75/EU as a combination of “best”, “techniques” and “available techniques”. Using this trio of conditions, the emphasis of the end result is (sensu lato) on achieving the most effective way of protecting the environment as a whole, under economically and technically viable conditions, and referring to the way in which the installation is designed, built, maintained, operated and decommissioned.

## Part 1 - About you

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### \* 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

The Bioenergy Association

\* Surname

of Finland

\* Email (this won't be published)

info@bioenergia.fi

\* Organisation/association/institution/authority name

*255 character(s) maximum*

Bioenergia ry - The Bioenergy Association of Finland

\* Organisation size

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

EU 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.

174042620514-51

## \*Country of origin

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

- |   |   |  |  |
|---|---|--|--|
| <input type="radio"/> Afghanistan         | <input type="radio"/> Djibouti                            | <input type="radio"/> Libya            | <input type="radio"/> Saint Martin                                 |
| <input type="radio"/> Åland Islands       | <input type="radio"/> Dominica                            | <input type="radio"/> Liechtenstein    | <input type="radio"/> Saint Pierre and Miquelon                    |
| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic                  | <input type="radio"/> Lithuania        | <input type="radio"/> Saint Vincent and the Grenadines             |
| <input type="radio"/> Algeria             | <input type="radio"/> Ecuador                             | <input type="radio"/> Luxembourg       | <input type="radio"/> Samoa  |
| <input type="radio"/> American Samoa      | <input type="radio"/> Egypt                               | <input type="radio"/> Macau            | <input type="radio"/> San Marino                                   |
| <input type="radio"/> Andorra             | <input type="radio"/> El Salvador                         | <input type="radio"/> Madagascar       | <input type="radio"/> São Tomé and Príncipe                        |
| <input type="radio"/> Angola              | <input type="radio"/> Equatorial Guinea                   | <input type="radio"/> Malawi           | <input type="radio"/> Saudi Arabia                                 |
| <input type="radio"/> Anguilla            | <input type="radio"/> Eritrea                             | <input type="radio"/> Malaysia         | <input type="radio"/> Senegal                                      |
| <input type="radio"/> Antarctica          | <input type="radio"/> Estonia                             | <input type="radio"/> Maldives         | <input type="radio"/> Serbia                                       |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini                            | <input type="radio"/> Mali             | <input type="radio"/> Seychelles                                   |
| <input type="radio"/> Argentina           | <input type="radio"/> Ethiopia                            | <input type="radio"/> Malta            | <input type="radio"/> Sierra Leone                                 |
| <input type="radio"/> Armenia             | <input type="radio"/> Falkland Islands                    | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore                                    |
| <input type="radio"/> Aruba               | <input type="radio"/> Faroe Islands                       | <input type="radio"/> Martinique       | <input type="radio"/> Sint Maarten                                 |
| <input type="radio"/> Australia           | <input type="radio"/> Fiji                                | <input type="radio"/> Mauritania       | <input type="radio"/> Slovakia                                     |
| <input type="radio"/> Austria             | <input checked="" type="radio"/> Finland                  | <input type="radio"/> Mauritius        | <input type="radio"/> Slovenia                                     |
| <input type="radio"/> Azerbaijan          | <input type="radio"/> France                              | <input type="radio"/> Mayotte          | <input type="radio"/> Solomon Islands                              |
| <input type="radio"/> Bahamas             | <input type="radio"/> French Guiana                       | <input type="radio"/> Mexico           | <input type="radio"/> Somalia                                      |
| <input type="radio"/> Bahrain             | <input type="radio"/> French Polynesia                    | <input type="radio"/> Micronesia       | <input type="radio"/> South Africa                                 |
| <input type="radio"/> Bangladesh          | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova          | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados            | <input type="radio"/> Gabon                               | <input type="radio"/> Monaco           | <input type="radio"/> South Korea                                  |
| <input type="radio"/> Belarus             | <input type="radio"/> Georgia                             | <input type="radio"/> Mongolia         | <input type="radio"/> South Sudan                                  |

- 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
- 
  
- 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
  
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
  
- Nepal
  
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
  
- Niger
  
- Nigeria
- Niue
  
- Norfolk Island
- Northern Mariana Islands
- North Korea
  
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
  
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
  
- Syria
  
- Taiwan
- Tajikistan
- Tanzania
- Thailand
  
- The Gambia
  
- Timor-Leste
- Togo
  
- Tokelau
- Tonga
  
- Trinidad and Tobago
- Tunisia
  
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu



Central African  
Republic

- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

## Publication - privacy settings

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

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**

**PLEASE TICK THIS BOX if you wish to remain Anonymous. We will only publish your type of respondent, country of origin and contribution. We will not publish any other details (name, organisation name and size, transparency register number, etc).**

**Public**

PLEASE TICK THIS BOX if you are happy to make your submission Public. We will publish your identification details (name, organisation name and size, transparency register number, country of origin) and your contribution.

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

## Part 2 – General awareness and views on the environmental impacts of agro-industrial activities

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This section asks about your general awareness of industrial emissions policy and to gather general views on revising the Industrial Emissions Directive (IED) and European Pollutant Release and Transfer Register (E-PRTR) Regulation. In each question, please select the answer which best represents your views.

**Please note that you can choose to respond to this section - Part 2 – and then choose not to answer the following section (Part 3). NB Also, in either Part 2 or Part 3 – you do not need to answer all of the questions.**

1. How important are the impacts of large industrial plants and intensive agricultural installations on the following environmental issues? :

	Very Important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil pollution (contaminated land)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution of rivers, lakes and ground water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Depletion of natural resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Perturbing natural habitats and ecosystems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of pollution or impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other please specify

*300 character(s) maximum*

2. Today, what is the contribution of large (agro)industrial plants to the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other issues, please specify

*300 character(s) maximum*

3. Post-2030, how important should the role be of large (agro)industrial plants for the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising pollution of soils, water and air in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising industry's emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising agriculture-related emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising effects on nearby natural habitats and ecosystems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating other changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other changes, please specify them

*300 character(s) maximum*

4. In the place where you mostly live, work or study, are there:

	Please tick one
No large (agro)industrial activities (if so, you may wish to skip Questions 5, 6 & 7)	<input type="radio"/>
Relatively few large (agro)industrial activities?	<input type="radio"/>
Some large (agro)industrial activities	<input type="radio"/>
Medium levels of large (agro)industrial activities	<input type="radio"/>
High levels of large (agro)industrial activities	<input type="radio"/>
I do not know	<input type="radio"/>



5. With regard to available information on the level of environmental impacts of large (agro)industrial plants in your places of interest (place where you live, work or study), do you agree that:

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
You have access to sufficient information on the types of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
You have access to sufficient information on the level of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

*300 character(s) maximum*

6. With regard to the granting, revision or enforcement of operating permits for large (agro)industrial plants in your places of interest (place where you live, work or study), how important is the principle that the public can find the information on the following questions... :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Which authority is responsible for granting and enforcing permits for the operation of large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I participate in the granting or revision of permitting decisions for large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I appeal against the granting of such permits, or appeal for them to be revised?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

*300 character(s) maximum*

7. For your places of interest (where you live, work or study), can you find information on the following? :

	Yes	No	I don't know
New or recent environmental permit applications to operate large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental permits that have already been granted to operate large (agro) industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance details for operators of large (agro)industrial plants with their environmental permit conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions monitoring data related to large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting information on environmental management performance of large (agro) industrial plants (e.g. resource consumption, energy use, greenhouse gas emissions, other)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT) for industry sectors / farming installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures and decisions related to the operation of large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**On behalf of the DG Environment IED Team, thank you very much for your time and your contribution!**

**NB PLEASE FEEL FREE TO STOP HERE, OR TO CONTINUE TO PART 3 (DETAILED QUESTIONS, requiring some specialised knowledge)**

If you have any questions, please contact the European Commission at this dedicated email address: [ENV-IED-REVISION@ec.europa.eu](mailto:ENV-IED-REVISION@ec.europa.eu)

## Part 3 – Detailed questions on revision of the IED and the E-PRTR

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Part 3 seeks to gather more detailed views on revising the IED provisions and the E-PRTR. Please select the answer which best represents your views.

**Please note that you can choose to respond to Part 3 only. Not all questions need to be answered.**

8. Do you agree with the following statement, with regard to each environmental issue outlined below? “The existing Industrial Emissions Directive, supplemented by horizontal legislation (e.g., Framework Directives on Waste and Water, Emissions Trading System, etc) and guidance on operating large (agro)industrial plants, sufficiently controls environmental impacts from these installations regarding...” :

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Air quality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fresh water quality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine water quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient water use in processes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient energy use in processes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumption of raw materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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"/>	<input checked="" type="radio"/>
Generation of waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitats and ecosystems, especially close to installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fostering Circular Economy approaches	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise emissions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour emissions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other issues, please specify them

*300 character(s) maximum*

9. For existing sectors covered by IED BREFs, to what extent do you agree that the following activities carried out at large (agro)industrial plants still have a significant negative impact on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy – large combustion plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Energy – oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - iron and steel, and other ferrous	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mineral industry – glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Waste incineration	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Independent industrial wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Slaughterhouses & animal by-products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ceramics industry	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



Intensive rearing of poultry or pigs



Do you think that the threshold for consideration under the IED should be reduced or modified for any of the above sectors? If so, to what level(s)? (500 character maximum limit)

*500 character(s) maximum*

10. Looking at possible NEW sectors to be covered by the IED and the associated BREFs process, to what extent do you agree that the following additional activities need to be addressed by the IED in order to significantly reduce significant negative impacts on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy industries – medium combustion plants (i.e. under the IED, rather than via the existing Medium Combustion Plant Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Urban waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy – oil and gas extraction activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Landfills - management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Storage of Hazardous Substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other activities, please specify which

*300 character(s) maximum*

11. To what extent do you think that the functioning of these current IED procedures needs to be improved in the future to optimise them?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
Environmental permitting procedure to operate an (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site inspections to ensure compliance with environmental permit conditions to operate an (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting of emissions monitoring data related to compliance with environmental permit conditions to operate the (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ease of obtaining information on what are considered to be best available techniques (BAT)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures related to the operation of large (agro) industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other issues - please specify which

*300 character(s) maximum*

12. How would you rate the functioning of the following aspects regarding the public's access to information in relation to agro-industrial activities and their impacts on the environment and on human health?

	Very easily available	Available moderately easily	Neither easily available nor difficult to access	Moderately difficult to access	Very difficult to access	I don't know

Information on IED permits already granted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information submitted by operators/ potential operators to competent authorities prior to IED permits being granted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the compliance of plants with IED permit conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Emissions monitoring data from agro-industrial plants covered by the IED	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of BAT at the individual (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other public information areas related to plant covered by the IED	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental performance of large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other public information areas, please specify which

*300 character(s) maximum*

13. To what extent do you think that enabling greater public participation in decision making in these current IED procedures needs to be improved in the future to optimise them, related to (agro)industrial activities and their impacts on the environment?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
IED permit applications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

BAT-AEL derogation on the grounds of geographical location, local environmental conditions or installation's technical characteristics – Article 15(4) of the IED	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other areas of public participation in IED decision making should be improved , please specify which

*300 character(s) maximum*

14. How would you rate the information provided in the E-PRTR regarding the environmental performance of large (agro) industrial plants?

	Very complete	Moderately complete	Neither complete nor incomplete	Moderately incomplete	Very incomplete	I don't know
Releases to air	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to soil	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers to waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to air	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases of pollutants from accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production volume of the facility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other issues - please specify if other aspects of environmental performance should be covered by the E-PRTR

*300 character(s) maximum*

15. How do you rate the search capability for information on industrial plant and agricultural operations in the E-PRTR? Do you consider that the following aspects work... ? :

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
Search by - facility name	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by – industrial activity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by - pollutant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by – geographical location	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other public information areas, please specify which

*300 character(s) maximum*

16. Going into sector-specific data in the E-PRTR, how would you rate the usefulness of the E-PRTR with regard to environmental performance data on these (agro)industrial sectors?

	Very satisfactory	Moderately satisfactory	Neither satisfactory nor unsatisfactory	Moderately unsatisfactory	Very unsatisfactory	I don't know
Energy – large combustion plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy – oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - iron and steel, other ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry processes - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry – glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Waste incineration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive rearing of poultry or pigs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



Energy use – medium combustion plants (i.e., via IED, rather than via existing MCP Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other activities, please specify which

*300 character(s) maximum*

17. Thinking in more detail about the pollutants covered by the E-PRTR:

a) Are there any pollutants that should be removed from the E-PRTR?

b) Are there any pollutants that should be added to the E-PRTR?

In addition to yearly emissions, we propose to consider presenting emissions listed in IED/BAT documents in mg/Nm<sup>3</sup>. This would provide an additional dimension for interpreting the data and would ease comparisons.

c) Are there existing E-PRTR pollutants, or their reporting thresholds, that should be amended? Please specify which

*300 character(s) maximum*

Steps should be taken towards real-time monitoring at least in energy, waste and process industry. From a technological perspective, it is possible to reliably monitor and report on most emissions real-time in plant /mill – location – Member State – EU level.

18. How well does public access to justice function in relation to (agro)industrial activities (e.g., siting of plant, operating permits etc)?

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
Public access to justice in my Member State	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public access to justice at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The right to bring a case before a court, or to ask for a judicial review in my Member State, functions...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other related elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you refer to other related elements, please specify which

*300 character(s) maximum*

If you think that other areas of public access to justice need to be addressed or improved with regard to agro-industrial plants, please specify which

*300 character(s) maximum*

19. In order to reach the objectives listed in the table below, what would be the necessary level of contribution from operators of large (agro)industrial plants? :

	Very high	High	Moderate	Low	Very low	I don't know
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a Circular Economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

*300 character(s) maximum*

20. 'In order to achieve the objectives listed in the table below, what would be the degree of effort needed from Member States' responsible competent authorities for large (agro)industrial plants? :

	Very high	High	Moderate	Low	Very low	I don't know
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing coherence with other EU environmental legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence with other EU safety-related legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying provisions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

*300 character(s) maximum*

21. Could the following objectives be achieved by EU Member States alone without intervention at EU level? (i.e. greater use of subsidiarity)

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Progress towards a zero-pollution ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Contribute to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU industry's competitiveness, resilience and transition to becoming climate-neutral, through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support new technologies and innovation that will facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence and synergies with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Simplify provisions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

*300 character(s) maximum*

22. When reviewing policy options in the IED and E-PRTR, how would you assess the following, in relative importance?

	Very important	Relatively important	Neutral	Relatively unimportant	Not important	I don't know
Options that contribute to a zero-pollution ambition for a toxic-free environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support EU industry's transition to becoming climate-neutral through decarbonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that realise EU industry's potential contribution to a circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support new technologies and innovation, that will support competitiveness and resilience and facilitate industry's shift to a climate-neutral, clean and circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support public access to environmental information relating to the impacts of industrial emissions; and also	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options to ensure a level playing field for companies and consistent regulatory implementation across EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that empower public participation in environmental decision making and access to justice.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Options that keep the administrative burden on business, and on government administrations, at a low level, but without compromising the effectiveness and efficiency of the EU in meeting its objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

*300 character(s) maximum*

23. In your opinion, when reviewing options for the revision of the IED, what are the main future potential impacts on large (agro)industrial plants that will need to be assessed (max. 500 characters, please) ? :

*500 character(s) maximum*



24. Following COVID-19, how do you assess the following statements?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Revisions to the IED should very strongly contribute to the acceleration of the transition towards a green and digital economic recovery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding earmarked for the “Green Deal” and for the EU’s transition to a zero-pollution economy by 2050 should not be diverted to continue the “business as usual” trend regarding agro-industrial plants as part of the EU’s response to COVID-19	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

*300 character(s) maximum*

25. Whilst maintaining the effectiveness of the IED/EPRTTR legislation, would you see any possibilities to reduce costs? :

*500 character(s) maximum*

26. What is your view on the capacity of the IED and EPRTTR to ensure a level playing field and fair competition?

*500 character(s) maximum*

The permitting officials have excessive power of consideration on environmental permits. Due to this, the permitting procedures as well as implementation of the BAT requirements vary greatly between Member States and between permitting officials. This has had direct consequences e.g. on the level of emissions in different parts of the EU, but also on costs to the operators. Actions aimed at harmonising the situation across the block would be needed to ensure a more level playing field.

## Any other comments

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Please include any further information that would be useful for the ongoing impact assessments of the Industrial Emissions Directive (IED) or E-PRTR Regulation. In particular, please provide public references to relevant studies, position papers, and case studies or alternatively, please upload relevant documents. If you have already uploaded such a document as part of consultation activities undertaken for the reviews of the IED or the E-PRTR Regulation, please do NOT upload the same document again here.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

**cbe08bfd-4b09-4310-bd6f-72949fb2c353/Bioenergia\_IED\_23.3.2021.pdf**

If you are familiar with the IED and its implementation, or the E-PRTR, please indicate if you are happy to be contacted to participate in targeted consultation activities.

- YES, please include me / my organisation in the targeted consultation activities on revision of the IED
- YES, please include me / my organisation in the targeted consultation activities on revision of the E-PRTR

In particular, if you have any further information that you believe would be useful for this impact assessment, please respond to the subsequent Targeted Stakeholder Survey that will also be conducted for this study. The targeted survey offers the opportunity to provide public references/documents for relevant studies.

**On behalf of the DG Environment IED Team, thank you very much for your contribution to this Consultation!**

If you have any questions, please contact the European Commission at this dedicated email address: **ENV-IED-REVISION@ec.europa.eu**

## **Contact**

ENV-IED-REVISION@ec.europa.eu

## Position on the Revision of the Industrial Emissions Directive (IED)

The Bioenergy Association of Finland thanks the European Commission for the opportunity to give its view on the revision of the Industrial Emissions Directive (IED). We would like to highlight the following key issues.

The regulation of the Medium Combustion Plants should remain under the Medium Combustion Plant Directive. The MCP Directive is rather new and the requirements for the new plants have just been implemented in national legislations and for the existing plants they are not yet applied. The operators are expecting a reasonable and stable legislative environment. There is no environmental need to amend this up-to-date regulation within the IED revision.

The possible extension of the IED regarding new policy objectives (contribution to climate, circular economy, and new technology deployment) should be done very carefully. The revision should not lead to overlapping regulation. The “Sevilla process” and permitting should not be repeated without a very in-depth assessment.

We emphasise that the key tool for cutting GHG emissions in European industry is – and should also continue to be – a strong EU ETS (Emission Trading Scheme). We do not need any overlapping tools for GHG emission reductions, which only lead to excessive regulation and decreasing transparency. Therefore, an overlap of the ETS and the IED should be avoided. The GHG emission limits should not be set on activities under the ETS, and the decarbonisation should not be considered in BAT regarding the activities under the ETS. Further measures to reduce GHG-emissions from industry should be focused on strengthening the ETS in the Fit-for-55 package.

As for the circular economy, the relevant promoting actions are mainly based on a value chain approach whilst the IED focuses on a single installation. The requirements for the upstream and downstream impacts risk leading to harmful and unintended effects on the market. The overlap of the waste and product legislation and the IED should also be avoided. The IED permitting should mainly cover the environmental effects born at site and therefore it is not the main tool for circular economy.

Regarding the deployment of the emerging and breakthrough technologies in the IED scope, the choice and deployment of the technology should be decided by the operator as he/she sees fit. It is the operator’s responsibility to choose a technology that meets the current and future market demand as well as the targets set by the regulation. Cherry-picking certain technologies in legislation does not support technology neutrality, market-based competition, or technological development.

The current IED works rather well and fits for its purpose to address pollutants to air, water, and soil and to prevent the generation of waste, in order to achieve a high level of protection of the

environment taken as a whole. The IED should remain a pollution prevention regulation and, thus, its primary target should be in laying down the rules for reducing polluting emissions.