

# OUR BACKGROUND WORK ON EU BREFS

## WT BREF transposition meeting in France, 08/11

- The Ministry did incorporate all of the following submissions made by the EEB delegate (on behalf of French member FNE): the scope of what is considered as a relevant substance for the inventory was extended to consider any other inputs that could have an environmental impact from the treatment, a specific obligation to focus attention on heavy metals, micropollutants and POPs.
- The unclear applicability restriction for enabling a side-lining of the BAT requiring enclosure of storage and treatment sites was clarified to mean any size >100m<sup>2</sup> as being a potential excuse
- The ELV for treatment of mercury containing electronics was tightened to 5µg/Nm<sup>3</sup>.
- Regarding treatment of PCB containing waste, a new obligation of periodic PCB monitoring in the environment within a 300m radius around the site was introduced.
- For biological treatment, the ELV for odour emissions was tightened by factor 2 (halved) and the loophole to exclude manure effluents from any odour and methane ELV was deleted.



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- On the negative aspects however the French ministry did not follow up on the request of the NGOs to remove the option for the competent authority to not apply indirect discharge BAT-AELs for heavy metals to water.
- The Ministry proposed a formula that would enable the permit writer (Prefet) to not set BAT-AEL at the site discharging indirectly to surface waters if the abatement efficiency at the downstream wastewater treatment plant would achieve an “equivalent” emission level as if achieved by applying the indirect water BAT-AEL upstream.
- Our position is that (urban) wastewater treatment plants are not properly designed to effectively abate recalcitrant pollutants such as heavy metals and this dilution would not promote at the source pollution controls. Heavy metals will most likely end up in the sewage sludges. FNE is considering legal steps to prevent this bad precedent from passing.

If you want to get active in transposition, make sure to check the [EEB guide For NGOs implementing EU standards for waste treatment!](#)



# MORE ON EU BREFS

## New EU environmental standards for waste incineration

The new specifications stem from a review of the Best Available Techniques (BAT) Reference Document (BREF) for Waste Incineration. The review's BAT conclusions were published in the [Official Journal of the EU](#) on 3 December 2019.

## Food, drink and milk industries

The Commission implementing decision establishing the BAT conclusions for the Food, Drink and Milk Industries has been published in the [Official Journal of the European Union](#).

## WGC BREF draft

The [first draft of the BREF on Common Waste Gas Management and Treatment Systems in the Chemical Sector \(WGC\)](#) has been issued on 29/11/2019.

Deadline to receive comments: 28 February 2020.

