

# UPDATE ON DECEMBER EVENTS



## NGO event on changing the culture of regulating industrial activities 16 December 2019, Brussels

Member States and environmental NGOs met to exchange opinions on permitting and enforcement under the EU Industrial Emissions Directive.

We successfully countered industry attempts to weaken the requirements linked to emissions level and monitoring of organic compounds.

The discussions focused on:

- The setting of permit conditions, e.g. the practice of authorities to set pollutant emission limits based on the upper end of the range of the BAT-AELs;
- The use of Article 15.4 derogations;
- Access to information and public participation in the permitting procedure;
- Enforcement.

You can access [our presentation](#) here.

The minutes from the event will follow upon approval by Member States representatives.



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## Commission-organised workshop on the IED evaluation 17 December 2019, Brussels

The final stakeholder workshop on the evaluation of the Industrial Emissions Directive took place on the 17<sup>th</sup> of December in Brussels.

### Main conclusions

- The consultants Riccardo and Milieu presented the main findings from the [Open Public Consultation and the Targeted Questionnaire](#);
- The consultants mixed up the ENGO category (such as the EEB) with “others” that included representatives from Chamber of Commerce, the Finnish Chemical Industry trade union or even Siemens that accidentally labelled itself as ENGO. We insisted those mistakes to be corrected and the ENGO category to be “cleaned” from other non-NGO affiliated or even the anonymous submissions made as “environmental organisations”. The main reason is mis-representing of the views of the (authentic) ENGO stakeholder group, coordinated by the EEB;
- The background paper raised many of the shortcomings mentioned in the EEB submission as to the effectiveness, efficiency, relevance and coherence of the IED;
- As regards to EU added value, there was an overall robust conclusion that the instrument is of added value compared to individual Member States approach;



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- The EEB's points were in part supported by Sweden (GHG inclusion and substitution of chemicals of concern), Germany and even by some industry representatives as regards to specific points (improved water protection in case of indirect discharge, load based limits, more resource consumption integration);
- EU Commission's Veronica Manfredi, made some very helpful statements on the Commission's commitment to deliver on the EU Green Deal objectives (Zero Pollution and climate neutral economy).

## Next steps

- Stakeholders may submit additional input – in the form of additional evidence to substantiate points made – by 17/01/2020;
- The EEB will submit on the following aspects:
  - the new draft finding of the Aarhus Compliance Committee case ACCC/C/2014/121 to COM IIDMA, supported by the EEB, confirming that the public participation requirements are too restrictive and not fully compliance with the Aarhus Convention;
  - a written request to split the NGO group from the “others” category and remove any anonymous submission made by “environmental organisations” unless we confirmed the veracity environmental organisation affiliation;
  - further evidence on why a ‘Regulation’ is the more adequate choice of instrument compared to a Directive.

The Commission document on the evaluation should be available by the second quarter of 2020. For more information please contact Aliko, Jean-Luc or Christian.

[Further reading on EEB's position on the IED](#)

[Workshop documents](#)

