

‘Entering the digital age for more effective reporting on industrial activities’

25 June 2021 (virtual) workshop

14:00-16:30 (Brussels time)

Annex

Part A: EEB Proposal of harmonised EU annual compliance report template (in a nutshell):

- I. A common electronic annual compliance report interface template is agreed, which defines the mandatory and optional information items to be filled out for reporting;
- II. The EU centralised database system (e.g. EEA Industrial Pollution Portal) can retrieve the datafields and make those available online throughout the EU (overcoming language barriers);
- III. Operators across Europe would have to directly fill-in the electronic annual compliance report template (the maximum annual frequency is retained, shorter periods should be considered (for continuously measured parameters e.g. to air / water) and whenever the permit condition status are up for change;
- IV. The competent authority (CA) retains the validation of the supplied raw data, the electronic interface enables the CA to indicate status of the data e.g. validation of the data pending / data verified for verification, however the raw monitoring data / performance information are supplied to the public.

Advantages and added value of such an approach:

- stakeholders acting at national or EU level to get easy access to information on equivalent industrial activities, allowing better benchmarking of environmental performance;
- identification of hotspots to be identified for improvement opportunities, also improve collaboration within the industry to improve and learn from others;
- better use of information available for other purposes e.g. BREF reviews and compliance promotion and monitoring (see recent BAT-C obligations on CMS/inventories);
- an improved level playing field for industry’
- Reduced administrative burden for Member States, already required to report on IED implementation to the European Commission, on an annual basis
- administrative burdens linked to translation and EU level reporting is reduced and data handling interface is mutualised (cost savings)

The IED Art 14(1) point d) annual compliance report requires the operator to provide, ‘at least annually’, *“information on the basis of results of emission monitoring [...] and other required data that enables the competent authority to verify compliance with the permit conditions”*. The basic principles and content of the IED permit are specified in Article 14, cross-linking to the basic principles listed in Article 11 and the applicable BAT requirements. Therefore permits relate to all measures aimed to prevent pollution and thus lay down requirements as to releases (emissions), consumption data (water, energy, chemicals input),

waste generation, monitoring conditions etc. In order to enable a verification of compliance with the permit conditions those conditions must be known and hence are available.

We propose a an IED annual compliance report template comprised by 11 sections:

- I. General information about the plant and the operator (INSIPRE codes, administrative information required under IED COM implementing decision 2018/1135
- II. Air emissions data, incl. reference conditions, uncertainty, type of monitoring (incl. cell to upload raw continuous emissions monitoring (CEM) data), and emission intensity data (per production output)
- III. Water data, including on emissions, consumption and circular economy type of info (amount of waste water recycled)
- IV. Energy data, including on fuel type, energy efficiency and intensity
- V. Operating hours & Other than Normal operating Conditions (OTNOC) incl. measures undertaken to manage OTNOC occurrences
- VI. Resource consumption incl. fuel and chemicals, as well as measures to improve resource efficiency
- VII. Abatement techniques, incl. both methods of operation and technologies (as per the IED definition of 'technique'), retrofits, and plans of future retrofits linked to the on-going improvement of environmental performance, as demanded by standard Environmental Management Systems, this could also include information on scale of investments made by the operator or other useful information on best practice to prevent impact or continuously improve performance
- VIII. Waste management, incl. waste types, codes and destination (recycling / disposal)
- IX. Derogations
- X. Chemicals management
- XI. Other, incl. Information on noise pollution etc.

SEE Excel Template circulated with invite by email (example is for Large Combustion Plants)

NB: "Performance" needs to be brought into context (namely the ratio of negative environmental impact versus the useful service or product provided by the industrial activity). Therefore, defining the proper reporting metric is crucial and may need a differentiated approach for certain IED activities. *The illustrative example provided above is for Large Combustion Plants.*

Part B: Preliminary set of guiding questions:

Q1: would you agree that enabling EU wide comparison of applied permit conditions and assessment of environmental performance information would be of added value for various purposes e.g. compliance promotion and benchmarking?

Q2: Would you agree that it is possible to define an EU model of an IED annual compliance report that would be used as a common input interface system?

Q3: would you agree with the proposed setup of topical issues to be reported upon, those fields to be mandatory, if which fields would you consider as optional fields and for which reason?

Q4: do the permit conditions at your national system set measures on consumption relevant aspects (water/energy or other inputs? Is the reporting voluntary / mandatory?

Q5: What are the bottlenecks in making CEM data directly accessible at an EU centralized database (e.g. cyber-attacks, costs, software issues)? Is this desirable at EU level? E.g. CEMs network in Lombardia region, Croatia, other examples mentioned in the tele-reporting study by RICARDO <https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/44dd9a9e-27fd-430d-8b36-ac29dfebde07/details>]