



Joint civil society position: “Main asks” IED Trialogues

This paper sets out the main demands of environmental citizens organisations regarding the trialogues on the EU Directive on Industrial Emissions (IED). See detailed rationale in the 5 pager document: <https://eeb.org/library/joint-civil-society-position-for-the-trilogues-on-the-industrial-emissions-directive/>

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A rigorous IED would ensure people’s right to breathe clean air, drink clean water and eat food grown on toxic-free soil – while ensuring a level playing field for industry actors. We therefore ask the national governments and Members of European Parliament to put public interests first by supporting activity the following key asks in the ongoing trialogues:

- 1. Annex I, Ia:** Reject any increase of the proposed 350 livestock units (LSU) in the scope, ensure intensive cattle rearing will be regulated (reject EP AM 28, 251,252,253, 255, 256).
- 2. Chapter VIa:** Ensure that most intensive pig and poultry factory farms (Annex I Point 6.6), are subject to a full permit regime pursuant to Chapter III of the IED (reject EP AM253,255,256, improve EP AM289,184).
- 3. “Extensive farming” definition:** Reduce stocking density level to max 1LSU/ha and refer to farms satisfying Organic farming practices as mandatory criterion (improve EP AM54).
- 4. Art. 70(i), Art. 70i(1a):** Ensure the Operating Rules make an explicit cross-link to Annex III. (support EP AM202,194).
- 5. Annex I, Art. 74:** Include extraction and treatment of industrial minerals, including silver, without thresholds (support EP AM229, Reject EP AM3,55,56,210,230,231).
- 6. Art. 79a:** Ensure an effective compensation right for victims of *illegal* pollution that includes accountability of authorities when acting unlawfully, disclosure obligation, representative actions and presumptions before courts (improve EP AM218,282,220. Reject EP AM283).
- 7. Art. 25:** Expand access to justice for individuals to ‘any’ breaches or omissions (improve EP AM150, Support EP AM151,152,200).
- 8. Art. 79:** Create a penalty provision with a reference to the (mother) company’s turnover within the Union with at least 4% (support EP AM213).
- 9. Art. 8:** Ensure mandatory suspensions in case of continuous breaches of the law (support EP AM78,79,80,81,82).



- 10. Art. 27d:** Maintain transformation plans at installation level (reject EP AM26,258,167,260).
- 11. Art. 15(3):** Reject or keep transition periods to the minimum. Decouple the application of Art. 15(3) from the availability of new BAT Conclusions for activities that are already covered by today's binding BAT Conclusions (improve EP AM116, support EP AM138, reject EP AM23,274). Require operators to make the non-feasibility assessment available in the Industrial Emissions Portal by latest 01/01/2026.
- 12. Art. 15(3a):** Make environmental performance levels explicitly binding (reject EP AM17,23,48,58,273).
- 13. Art. 11fb, Art. 14a:** Uphold the considerations of life-cycle environmental performances (reject EP AM87, 110. Support EP AM 46,238,240, 241,242).
- 14. Art. 50 (2a):** Protect human health from dioxins and dioxin like-PCBs emissions from incinerators (support EP AM175,250) and Art. 58(1) substitution of hazardous solvents (support EP AM177).
- 15. Art. 5 and 24:** Support the standardised permit summary and electronic permitting system (support EP AM66, 68,146,147,148,149).
- 16. IE Portal:** Ensure reporting tools support transparent benchmarking of BAT uptake and compliance promotion (support EP AM144,145). Mandate the EEA to provide the electronic input forms needed to streamline, ease up and consolidate the publication and reporting obligations with the annual compliance report (Art 14.1 point d). The IE Portal must also provide for a *query based* tracking of progress on environmental performances (see further 10 points IEP-R related asks [here](#) (improve EP AM205,243).
- 17. Art. 3a:** Reject any backtracking in terms of permit publication, and secrecy approach on information exchange regarding EU BREF standards making (reject EP AM8,12, 65,94,113).