

# Feedback on the Berlin Workshop

**IED Article 13 forum meeting  
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## **To cover:**

**1. What we did**

**2. Main observations**

**3. Way forward**

# 1. What we did

*'BAT information exchange process as the heart and driver of the IED'* (16–17 October 2014)

**Organised by:** European Commission + Germany

**Hosted by:** German Ministry of Environment, Berlin

**Attendees:** MS (38) + industry (23) + eNGO (4) + observers (2) + Commission (7) = **74 Total**

## **Aims:**

1. Take stock of lessons learnt from 4 years of BAT information exchange process under the IED.
2. Identify where the process has been successful and where there might be room for further improvement.

# 1. What we did

## **Day 1: Scene-setting:**

- *Welcome, overview & purpose of the workshop:* Gertrud Sahler, BMUB
- *Policy landscape:* Christopher Allen, DG ENV
- *17 years of making BREFs – from IPPC to IED:* Serge Roudier, EIPPCB

## **Day 1: Stakeholder experiences & suggestions:**

- Member States: IT, PL, DE, SE
- Environmental NGO: EEB
- Industry: Industrial Alliance

Presentations on CIRCABC

## **Day 2: Working groups:**

- 4 parallel groups (mixed groups each aided by Moderator+Rapporteur)
- 'Supporting Paper' sent to participants on 13/10/14
  - Topic 1 : Products (BREFs and BAT conclusions)
  - Topic 2 : BAT information exchange process
- Reports back / Discussion / Concluding session

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## 2. Main observations

### The workshop itself:

- Positive atmosphere & constructive discussions
- Cooperative desire to make improvements

### Overall assessment of the Sevilla process:

- a) Affirmation of its fundamental, and unique, components (inclusive, collaborative, consensual, technical & economic data evaluation).
- b) Recognition that it's an ever-evolving process where continuous improvements are visible.

## 2. Main observations – the 'process'

✓ **Frontloading** – early preparation; build on existing BREF

✓ **Focus**

- key environmental issues, followed by targeted data collection
- BAT conclusions (especially AELs)

**Smarter working methods:** Use web conferences ('webinars')  
e.g. to explain intermediate documents, to present/assess data.

## 2. Main observations – the 'process'

### Data collection / questionnaires:

- limit to the most important and useful data (balance data complexity against data volumes).
- consistent rules on: reference plant selection, completion, quality checking, submission route
- consistent on: OTNOC, reference conditions
- early agreement on averaging periods (short / long term) and load/concentration
- data evaluation before Draft 1 of BREF (workshop, webinar)
- two-step process – general data + targeted follow-up
- dedicated workshop to learn from past questionnaires



## 2. Main observations – the 'process'

### Data confidentiality

- Minimise: only where fully justified
- If unavoidable, whole TWG to be clear on how AE(P)L was derived

**Burden of final TWG meetings:** Resolve issues before the meeting e.g. issue background paper for final meeting 8 weeks before (rather than 4).

**Timing:** Keep to announced schedule / inform of unavoidable changes

**Meeting venue:** Choose a more central location for subgroup meetings

## 2. Main observations – the 'products'

**Chapters 1 & 2:** To prepare an initial sector profile before the kick-off meeting (using consultants and/or industry)

**Generic BAT:** Yes; where warranted.

**Mapping:** To enhance overall coherence, reduce overlaps or gaps by 'mapping' which BREF covers which IED activities.

### **Footnotes in BAT conclusions:**

- Limit their use. If used, be precise and specific.
- Early identification of 'special cases' & collect data.

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### **3. Way forward – Commission actions**

1. Update full forum with a summary of the workshop discussions ✓
2. Draft a detailed report of the event and make it publicly available on CIRCABC.
3. Test ideas in practice (in the short-medium term).