

# Evaluation of the Industrial Emissions Directive

Fields marked with \* are mandatory.

## Introduction

---

*The Industrial Emissions Directive 2010/75/EU (IED) is the primary instrument in place at the EU level to control and mitigate the environmental and human health impacts arising from industrial emissions in the EU. The IED regulates around 50 000 of the largest industrial installations covering a wide range of agro-industrial sectors. These include: power plants, refineries, and production of steel, non-ferrous metals, cement, lime, glass, chemicals, pulp and paper, food and drink as well as waste treatment and incineration and the intensive rearing of pigs and poultry. The general objective of the IED is to prevent, reduce and eliminate as far as possible emissions into air, water and land arising from industrial activities.*

*The IED aims to ensure that industrial emissions are dealt with in an integrated way and minimised. Permits must be issued for these installations by national authorities with conditions based on the use of Best Available Techniques (BAT). To ensure a comparable EU approach, sectoral BAT Reference Documents (BREFs) are produced through an EU level techno-economic assessment carried out by a Technical Working Group of the Commission, Member States, industry and civil society. The BAT Conclusions are adopted as Commission implementing acts.*

*The IED is now undergoing an evaluation against the following five key evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value, and this public consultation is part of this evaluation process. Your responses provided to this questionnaire will be analysed and will feed into the overall IED evaluation process.*

*The roadmap of the evaluation process can be found [here](#).*

## About you

---

### \* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish

- ☐ French
- ☐ Gaelic
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

\* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

\* First name

Bertrand

\* Surname

VALLET

\* Email (this won't be published)

bertrand.vallet@eureau.org

\* Organisation name

*255 character(s) maximum*

EurEau, European Federation of National Associations of Water Services

\* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

39299129772-62

\* Country of origin

Please add your country of origin, or that of your organisation.

- |   |   |  |  |
|---|---|--|--|
| <input type="radio"/> Afghanistan         | <input type="radio"/> Djibouti                            | <input type="radio"/> Libya            | <input type="radio"/> Saint Pierre and Miquelon                    |
| <input type="radio"/> Åland Islands       | <input type="radio"/> Dominica                            | <input type="radio"/> Liechtenstein    | <input type="radio"/> Saint Vincent and the Grenadines             |
| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic                  | <input type="radio"/> Lithuania        | <input type="radio"/> Samoa  |
| <input type="radio"/> Algeria             | <input type="radio"/> Ecuador                             | <input type="radio"/> Luxembourg       | <input type="radio"/> San Marino                                   |
| <input type="radio"/> American Samoa      | <input type="radio"/> Egypt                               | <input type="radio"/> Macau            | <input type="radio"/> São Tomé and Príncipe                        |
| <input type="radio"/> Andorra             | <input type="radio"/> El Salvador                         | <input type="radio"/> Madagascar       | <input type="radio"/> Saudi Arabia                                 |
| <input type="radio"/> Angola              | <input type="radio"/> Equatorial Guinea                   | <input type="radio"/> Malawi           | <input type="radio"/> Senegal                                      |
| <input type="radio"/> Anguilla            | <input type="radio"/> Eritrea                             | <input type="radio"/> Malaysia         | <input type="radio"/> Serbia                                       |
| <input type="radio"/> Antarctica          | <input type="radio"/> Estonia                             | <input type="radio"/> Maldives         | <input type="radio"/> Seychelles                                   |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Ethiopia                            | <input type="radio"/> Mali             | <input type="radio"/> Sierra Leone                                 |
| <input type="radio"/> Argentina           | <input type="radio"/> Falkland Islands                    | <input type="radio"/> Malta            | <input type="radio"/> Singapore                                    |
| <input type="radio"/> Armenia             | <input type="radio"/> Faroe Islands                       | <input type="radio"/> Marshall Islands | <input type="radio"/> Sint Maarten                                 |
| <input type="radio"/> Aruba               | <input type="radio"/> Fiji                                | <input type="radio"/> Martinique       | <input type="radio"/> Slovakia                                     |
| <input type="radio"/> Australia           | <input type="radio"/> Finland                             | <input type="radio"/> Mauritania       | <input type="radio"/> Slovenia                                     |
| <input type="radio"/> Austria             | <input type="radio"/> North Macedonia                     | <input type="radio"/> Mauritius        | <input type="radio"/> Solomon Islands                              |
| <input type="radio"/> Azerbaijan          | <input type="radio"/> France                              | <input type="radio"/> Mayotte          | <input type="radio"/> Somalia                                      |
| <input type="radio"/> Bahamas             | <input type="radio"/> French Guiana                       | <input type="radio"/> Mexico           | <input type="radio"/> South Africa                                 |
| <input type="radio"/> Bahrain             | <input type="radio"/> French Polynesia                    | <input type="radio"/> Micronesia       | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Bangladesh          | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova          | <input type="radio"/> South Korea                                  |
| <input type="radio"/> Barbados            | <input type="radio"/> Gabon                               | <input type="radio"/> Monaco           | <input type="radio"/> South Sudan                                  |

<input type="radio"/> Belarus	<input type="radio"/> Georgia	<input type="radio"/> Mongolia	<input type="radio"/> Spain
<input checked="" type="radio"/> Belgium	<input type="radio"/> Germany	<input type="radio"/> Montenegro	<input type="radio"/> Sri Lanka
<input type="radio"/> Belize	<input type="radio"/> Ghana	<input type="radio"/> Montserrat	<input type="radio"/> Sudan
<input type="radio"/> Benin	<input type="radio"/> Gibraltar	<input type="radio"/> Morocco	<input type="radio"/> Suriname
<input type="radio"/> Bermuda	<input type="radio"/> Greece	<input type="radio"/> Mozambique	<input type="radio"/> Svalbard and Jan Mayen
<input type="radio"/> Bhutan	<input type="radio"/> Greenland	<input type="radio"/> Myanmar /Burma	<input type="radio"/> Swaziland
<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
<input type="radio"/> Bonaire Saint Eustatius and Saba	<input type="radio"/> Guadeloupe	<input type="radio"/> Nauru	<input type="radio"/> Switzerland
<input type="radio"/> Bosnia and Herzegovina	<input type="radio"/> Guam	<input type="radio"/> Nepal	<input type="radio"/> Syria
<input type="radio"/> Botswana	<input type="radio"/> Guatemala	<input type="radio"/> Netherlands	<input type="radio"/> Taiwan
<input type="radio"/> Bouvet Island	<input type="radio"/> Guernsey	<input type="radio"/> New Caledonia	<input type="radio"/> Tajikistan
<input type="radio"/> Brazil	<input type="radio"/> Guinea	<input type="radio"/> New Zealand	<input type="radio"/> Tanzania
<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
<input type="radio"/> British Virgin Islands	<input type="radio"/> Guyana	<input type="radio"/> Niger	<input type="radio"/> The Gambia
<input type="radio"/> Brunei	<input type="radio"/> Haiti	<input type="radio"/> Nigeria	<input type="radio"/> Timor-Leste
<input type="radio"/> Bulgaria	<input type="radio"/> Heard Island and McDonald Islands	<input type="radio"/> Niue	<input type="radio"/> Togo
<input type="radio"/> Burkina Faso	<input type="radio"/> Honduras	<input type="radio"/> Norfolk Island	<input type="radio"/> Tokelau
<input type="radio"/> Burundi	<input type="radio"/> Hong Kong	<input type="radio"/> North Korea	<input type="radio"/> Tonga
<input type="radio"/> Cambodia	<input type="radio"/> Hungary	<input type="radio"/> Northern Mariana Islands	<input type="radio"/> Trinidad and Tobago
<input type="radio"/> Cameroon	<input type="radio"/> Iceland	<input type="radio"/> Norway	<input type="radio"/> Tunisia
<input type="radio"/> Canada	<input type="radio"/> India	<input type="radio"/> Oman	<input type="radio"/> Turkey
<input type="radio"/> Cape Verde	<input type="radio"/> Indonesia	<input type="radio"/> Pakistan	<input type="radio"/> Turkmenistan
<input type="radio"/> Cayman Islands	<input type="radio"/> Iran	<input type="radio"/> Palau	<input type="radio"/> Turks and Caicos Islands
<input type="radio"/> Central African Republic	<input type="radio"/> Iraq	<input type="radio"/> Palestine	<input type="radio"/> Tuvalu
<input type="radio"/> Chad	<input type="radio"/> Ireland	<input type="radio"/> Panama	<input type="radio"/> Uganda
<input type="radio"/> Chile	<input type="radio"/> Isle of Man	<input type="radio"/> Papua New Guinea	<input type="radio"/> Ukraine
<input type="radio"/> China	<input type="radio"/> Israel	<input type="radio"/> Paraguay	<input type="radio"/> United Arab Emirates
<input type="radio"/> Christmas Island	<input type="radio"/> Italy	<input type="radio"/> Peru	<input type="radio"/> United Kingdom
<input type="radio"/> Clipperton	<input type="radio"/> Jamaica	<input type="radio"/> Philippines	<input type="radio"/> United States
<input type="radio"/> Cocos (Keeling) Islands	<input type="radio"/> Japan	<input type="radio"/> Pitcairn Islands	<input type="radio"/> United States Minor Outlying Islands
<input type="radio"/> Colombia	<input type="radio"/> Jersey	<input type="radio"/> Poland	<input type="radio"/> Uruguay

- |  |                                  |   |   |
|--|----------------------------------|---|---|
| <input type="radio"/> Comoros                          | <input type="radio"/> Jordan     | <input type="radio"/> Portugal                                    | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo                            | <input type="radio"/> Kazakhstan | <input type="radio"/> Puerto Rico                                 | <input type="radio"/> Uzbekistan        |
| <input type="radio"/> Cook Islands                     | <input type="radio"/> Kenya      | <input type="radio"/> Qatar                                       | <input type="radio"/> Vanuatu           |
| <input type="radio"/> Costa Rica                       | <input type="radio"/> Kiribati   | <input type="radio"/> Réunion                                     | <input type="radio"/> Vatican City      |
| <input type="radio"/> Côte d'Ivoire                    | <input type="radio"/> Kosovo     | <input type="radio"/> Romania                                     | <input type="radio"/> Venezuela         |
| <input type="radio"/> Croatia                          | <input type="radio"/> Kuwait     | <input type="radio"/> Russia                                      | <input type="radio"/> Vietnam           |
| <input type="radio"/> Cuba                             | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Rwanda                                      | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao                          | <input type="radio"/> Laos       | <input type="radio"/> Saint Barthélemy                            | <input type="radio"/> Western Sahara    |
| <input type="radio"/> Cyprus                           | <input type="radio"/> Latvia     | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Yemen             |
| <input type="radio"/> Czechia                          | <input type="radio"/> Lebanon    | <input type="radio"/> Saint Kitts and Nevis                       | <input type="radio"/> Zambia            |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho    | <input type="radio"/> Saint Lucia                                 | <input type="radio"/> Zimbabwe          |
| <input type="radio"/> Denmark                          | <input type="radio"/> Liberia    | <input type="radio"/> Saint Martin                                |   |

#### \* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

☒ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☒ I agree with the [personal data protection provisions](#)

## General awareness of industrial emissions and the measures to tackle them

---

*This section seeks to gather information on the general level of knowledge of emissions from large industrial installations, their evolution over time, and the measures in place to address them. It does not require an in-depth knowledge of the Industrial Emissions Directive.*

*Please select the answer which best represents your views.*

1. To what extent do large industrial installations operate in your places of interest (place where you live, work or study)?

- ☐ No industrial activity (skip questions 2 to 5)
- ☐ Low industrial activity
- ☒ Some industrial activity
- ☐ High industrial activity
- ☐ Very high industrial activity
- ☐ Do not know

2. To what extent do activities of large industrial installations located in your places of interest (place where you live, work or study) have an impact on the following environmental aspects?

	No impact at all	Some impact	Significant impact	Very significant impact	Do not know
Air Quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumption of natural resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil contamination	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste generation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. To what extent do activities of large industrial installations located in your places of interest (place where you live, work or study) have an impact on human health?

- ☐ No impact at all
- ☐ Limited impact
- ☐ Some impact
- ☐ Significant impact
- ☐ Very significant impact
- ☒ Do not know

4. Do you know which authority is responsible for granting and enforcing permits for large industrial installations in your places of interest (place where you live, work or study)?

- ☐ Yes, I know.
- ☐ No, I don't know.

5. Do you know how you can participate in permitting decisions for large industrial installations in your places of interest (place where you live, work or study)?

- ☐ Yes, I know.
- ☐ No, I don't know.

6. Do you have access to sufficient information on the level of environmental impacts of large industrial installations?

- ☐ No information at all
- ☐ Limited information
- ☒ Some information
- ☐ Sufficient information
- ☐ Very detailed information
- ☐ Do not know

7. In your opinion, has the level of environmental impacts from large industrial installations in the last 5 years:

- ☐ Significantly decreased
- ☐ Decreased somewhat
- ☐ Stayed the same
- ☒ Increased somewhat
- ☐ Significantly increased
- ☐ Do not know

8. In your opinion, the availability of information on the level of emissions from large industrial installations in the last 5 years has:

- ☐ Significantly increased
- ☒ Increased somewhat
- ☐ Stayed the same
- ☐ Decreased somewhat
- ☐ Significantly decreased
- ☐ Do not know

9. To what extent are you familiar with the following?

	Extremely familiar	Very familiar	Moderately familiar	Slightly familiar	Not familiar
EU legislation concerning industrial emissions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process used to establish permit conditions by local, regional or national competent authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The role of Best Available Techniques in permits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The environmental requirements set in permits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of emissions information on installations (for example from the European Pollutant Release and Transfer Register (E-PRTR*) and public registers)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Enforcement processes and use of penalties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
--	-----------------------	-----------------------	-----------------------	----------------------------------	-----------------------

(\*) <https://prtr.eea.europa.eu/#/home>

## Specialised views on the functioning of the Industrial Emissions Directive

*This section focuses on gathering more in-depth views about the functioning of the permitting system governed by the Industrial Emissions Directive and requires a certain level of corresponding knowledge. The questions are largely structured around the 5 evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value. Questions 10 to 20 can be skipped by the general public.*

*Please select the answer which best represents your views and/or indicate the extent to which you agree with the statements in the following questions.*

10. To what extent do you agree that the Industrial Emissions Directive (including its secondary legislation, i.e. regulations and decisions) has contributed to the following?:

	Stongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To reducing environmental impacts arising from large industrial activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To a more effective enforcement of permit conditions to control environmental impacts from large industrial installations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure an EU level playing field for EU Members States and operators of large industrial installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. To what extent do you agree that the regular updating of BREFs and permits (choose below) under the Industrial Emissions Directive has encouraged the development and deployment of better techniques to prevent and control environmental impacts from large industrial installations?



	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
BREFs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Permits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. To what extent do you agree that the process to draw up and regularly review BREFs:

	I am not familiar with /aware of the BREF process	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Is effective in identifying techniques for achieving a high level of environmental protection	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allows both costs and benefits to be sufficiently considered in identifying the best available techniques	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Captures new developments in techniques	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. To what extent is the cost to industrial installations of complying with permit conditions based on the use of BAT acceptable in view of the benefits?

- ☐ I am not familiar with/aware of the costs
- ☐ Extremely acceptable
- ☐ Very acceptable
- ☒ Moderately acceptable
- ☐ Slightly acceptable
- ☐ Not acceptable
- ☐ Do not know

14. To what extent are permits issued to large industrial installations based on the IED and BREFs effective in controlling the environmental impacts of those installations?

- ☐ Extremely effective
- ☐ Very effective
- ☐ Moderately effective
- ☒ Slightly effective
- ☐ Not effective
- ☐ Do not know

15. To what extent do you agree that the provisions of the IED on the following (permits, enforcement and access to information) have led to more effective control of the environmental impacts of large industrial installations?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Permits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to information	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

16. To what extent do you agree that the IED addresses the following:

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most relevant pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most polluting agro-industrial sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. To what extent do you agree that the process to draw up and regularly review BREFs addresses the following?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most relevant pollutants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The most polluting agro-industrial sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. To what extent is the IED internally consistent (no contradictions and no overlaps) among its chapters and provisions?

- ☐ Extremely consistent
- ☐ Very consistent
- ☐ Moderately consistent
- ☒ Slightly consistent
- ☐ Not consistent
- ☐ Do not know

19. To what extent is the IED coherent with the following EU policies?

	Extremely coherent	Very coherent	Moderately coherent	Slightly coherent	Not coherent	Do not know
Climate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular Economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. To what extent do you agree that legislation to regulate environmental impacts of large industrial installations at the EU level, as opposed to national level, helps the following?

--	--	--	--	--	--	--

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To better protect human health and the environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure that competent national authorities address industrial pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To avoid competition on environmental standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Any other comments

### 21. Please include any further information that you believe would be useful for this evaluation of the Industrial Emissions Directive.

Uniform understanding and application of IED across the EU is vital. The exclusion of activities covered by Directive 91/271/EEC on urban waste water (WW) treatment (IED annex 1 5.2. Disposal or recovery of waste) should be implemented in all countries.

Processes that are integral or very closely related to the practices of WW treatment should be excluded from the IED as it is for the Waste Framework Directive. Having the two differing regulatory criteria for 'waste' leads to confusion and ambiguity.

#### Overlaps:

The UK waste water operators see the need to clarify the reporting requirements of waste water treatment plants (WWTP) in the IED when Belgium (Flanders) sees no overlap because the responsible authority for issuing permits reports on whether the BAT/BREFs are applied based on audits of the installations to which IED applies. Interactions between IED and UWWTD should be clarified so to avoid double reporting in certain MS.

Finnish operators see overlap with the E-PRTR Regulation which demands phosphorus and nitrogen emissions to be reported. WWTPs over 100 000 PE need to report both emissions according to the UWWTD and the E-PRTR regulation

#### Inconsistencies:

More coherence is needed between Directive 2008/105/EC on Environmental Quality Standards, IED and sectoral BAT/BREF-documents.

IED is not consistent with the aims of the Circular Economy as many activities which are consistent with the waste hierarchy and recover/generate energy or result in waste recycling/recovery are captured as installations covered by the IED. Once materials are described as 'waste', 'precautionary' regulation can act as a disincentive and stifle innovation.

#### Discharges in the sewer network:

In some countries, IED installations are not allowed to discharge effluents in the sewer network, whereas it is allowed in others. IED and BAT/BREF documents should ensure that WW conveyed to public sewers and other WW containing contaminants have to be pretreated to:

1. prevent environmental hazards caused by pollutant release from WWTP and fulfil other requirements

concerning receiving water bodies

2. ensure the safe, environmentally acceptable use and final treatment of sludge
3. protect sewer networks and the health of the WWTP employees
4. prevent harm to the operation of treatment processes for WW and sludge
5. prevent sewer networks, WWTP and their equipment from damage.

Even if the treatment in a WWTP is sufficient, the industrial activities covered by the IED should be fully charged for the load of pollution brought to the WWTP (polluter pays principle). IED and BAT/BREF documents must set clear quality and information requirements prior to release effluent into sewers. It is vital to understand the emission routes and prevent environmental risks.

Investment needs:

Where related activities go beyond WW treatment and may fall under IED, such as thermal destruction of sludges, we note that BAT/BREF requirements can introduce a large amount of investment. Member States should have flexibility to allow operators to work towards compliance within funding cycles.

IED and innovation:

Additional obligations for WWTPs in the frame of the IED affect actions regarding the circular economy and can act as a disincentive and stifle innovation. These obligations should be addressed to facilitate and stimulate innovation without decreasing the requirement for environmental protection.

Consequences of industrial pollutants for drinking water (DW) suppliers

Despite the IED, pollutants from industrial sources continue to be released to the aquatic environment (EEA report on Status of European Waters, 2018). DW suppliers have to invest in increasingly expensive and energy-intensive treatment processes to remove pollutants and comply with (among others) the requirements of the DW Directive. It runs counter to EU water legislation, esp. art. 7.3 of the Water Framework Directive. IED and the related BATs must include requirements for the protection of water resources to avoid deterioration of the quality of water bodies and increased treatment by DW suppliers according to the precautionary principle, the principles on source control and polluter pays taken up in the TFEU.

The presence of GenX and Pyrazole in Dutch waters used for the production of DW is a case in point.

Access to information on emitted chemical substances

1/3 of water used for the production of DW in the Netherlands is impacted by industrial WWTP. Currently, the chemical plant or the industrial WWTP do not have to report emitted substances (of emerging concern) beyond those reported under by the E-PRTR. Complete registers with all substances and by-products produced or used in the plant are not publicly available. Accessibility of such information supports the Aarhus Convention and enables DW suppliers to better predict the effects on abstraction points. Moreover, the industrial WWTP could take additional measures to minimise any undesired release.

## Contact

ENV-IED-EVALUATION@ec.europa.eu