



13 May 2011

Industrial Emissions Alliance (IEA) common issues on the
DRAFT DOCUMENT for the development of guidance concerning the practical
arrangements for the exchange of information on BAT as referred to in Article
13(3)(c) and (d) of the Industrial Emissions Directive 2010/75/EU

The Industrial Emissions Alliance recognises the work carried out by the European Commission to develop a thorough guidance for the exchange of information on BAT. Both the guidance drafts and the meetings of the Sub-group IED Art.13 Forum provide a good basis for the participation of stakeholders in the making process.

The Industrial Emissions Alliance, representing 14 industrial sectors, would like to stress its position on the following general principles:

- The political process (decisions on BAT conclusions as adopted by Article 75 IED Committee) should not overrule the technical debate (BAT conclusions adopted by the Seville TWG);
- The technical conclusions of the TWG (as presently known in the Seville process) need to be clearly identified in the published BREF;
- Decisions on the number of BREF drafts and meetings should be left to the TWGs provided that timing is respected;
- It is essential to differentiate BAT for existing and new installations;
- BAT conclusions should not prescribe the use of techniques;
- Confidentiality of data should be properly dealt with when it is an issue.
