



# *Event Report*

**TAIEX EPPA Regional Workshop on the Industrial Emissions  
Directive**

**6-7 April 2021**

**Live video conference**



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**NIRAS** **umweltbundesamt<sup>U</sup>**

The project implemented by the Consortium of NIRAS (lead)  
and Umweltbundesamt GmbH

## 1 The event

The TAIEX EPPA Regional Workshop on the Industrial Emissions Directive took place on April 6-7, 2021, via live video conference. The workshop was organized in cooperation with TAIEX, and under the EPPA project work programme, namely activity 4.4 “Industrial Emissions Directive capacity building”. It targeted the following EPPA beneficiaries: Albania, Bosnia and Herzegovina, Kosovo\*, Montenegro, North Macedonia, Serbia, and Turkey.

The participants came from the relevant authorities of the EPPA beneficiaries involved in the implementation of the IED. They represented the Ministries with the environment, energy, and infrastructure portfolios, in addition to national environmental management and conservation agencies, and state inspectorates. Details are available in the list of participants. Civil society was represented by NGOs from the beneficiaries, namely: Co-PLAN (Albania), LIR Evolution (Bosnia and Herzegovina), Institute for Development Policy (Kosovo\*), NGO Green Home (Montenegro), Center for environmental research and information Eko-svest (North Macedonia), CEKOR- Center for Ecology and Sustainable Development (Serbia), and Kados – Kadikoy Friends of Science, Culture and Art Association (Turkey). The EU Delegations or Office in Albania, Bosnia and Herzegovina, Kosovo\*, North Macedonia, Serbia, and Turkey were also present.

The speakers represented EU Member States’ and EU institutions’ experience. There were experts from the relevant national authorities of DG Environment (Industrial Emissions and Safety Unit), European Commission, Austria, Croatia, Czechia, Ireland; Spain, and Slovakia. Additionally, the workshop mobilized contributions from Lafarge Holcim industry. Details are available in the agenda and the presentations can be downloaded in both the TAIEX website<sup>1</sup> and in the EPPA project website<sup>2</sup>.

The aim of the workshop was to provide advice and guidance on the Industrial Emissions Directive (IED) and its implementation. The workshop built on the current state of the implementation in the EPPA countries and on the previous workshops<sup>3</sup>. Special emphasis was put on topics such as cement factories, waste co-incineration (in cement factories and thermal power plants), waste incineration, preparation of different waste fractions for different uses, sampling plans for waste and solid recovered fuels.

## 2 Proceedings and conclusions

The workshop provided the EPPA beneficiaries the opportunity to take stock of their progress regarding the implementation of the IED. All beneficiaries intervened to report their recent developments, positive examples, lessons learned, planned activities and identified gaps. Transposition levels in the region vary from country to country, but in general more efforts are needed to harmonize national legislation with the Directive. Implementation levels can be increased if permitting and inspection capacities are improved in the legally competent national institutions. The beneficiaries remain active, through legislative and capacity building actions, in closing the gaps. Nevertheless, there are still significant numbers of installations, subject to the requirement of an integrated permit, operating without one. This is also partially due to industry’s lack of capacity to comply with all requirements (data, documentation, financing, outdated techniques).

The European Commission provided policy updates regarding the IED and its connections with circular economy and the Zero Pollution Action Plan. The EC updated its IED webpage recently, and it is also organizing an open public consultation regarding a potential IED revision. In this context, an online workshop was held on 15 December to explain the stakeholder consultation process for the impact assessments of the IED and the E-PRTR Regulation. The stakeholder consultation activities include an open public consultation, targeted stakeholder consultation and stakeholder workshops, which have been taking place since December 2020. It is expected that the consultations will lead to a legislative proposal for the revision of the IED by the end of 2021. The main problems being analysed in the impact assessment are related to the zero pollution ambition (alignment with REACH, Water Framework

<sup>1</sup> <https://webgate.ec.europa.eu/TMSWebRestrict/resources/js/app/#/library/detail/80631>

<sup>2</sup> <https://eppanetwork.eu/taix-eppa-regional-workshop-on-industrial-emissions-directive-2/>

<sup>3</sup> <https://webgate.ec.europa.eu/TMSWebRestrict/resources/js/app/#/library/detail/70586>,

<https://webgate.ec.europa.eu/TMSWebRestrict/resources/js/app/#/library/detail/69644>



Directive, POPs, and need for a chemical management system), carbon neutrality goals (expanding the scope of the IED to other GHG emitting sectors and creating synergies to deliver pollution abatement and GHG emission reduction, setting energy efficiency requirements through BATs), fostering the circular economy (binding BAT-AEPLs for resource efficiency, reporting obligations for circular economy procedures, promoting industrial symbiosis), deploying state-of-the-art techniques (revisions to avoid locking-in existing practices in favour of promoting best practices and emerging techniques), ensuring proportionality of any revision and public access to information. The stakeholder consultations seek to provide an opportunity to stakeholders to contribute to the assessment, update information provided by stakeholders, validate the problems guiding the assessment and gather opinions on the policy options and their impacts in terms of administrative burdens.

The EC also provided an overview of the status of BAT conclusions status per industrial sector, as well as plans for future developments until 2029. Additionally, the participants also learned about EU projects that support the implementation of the IED.

The capacity building dimension of the workshop centred on the cement industry, in particular the use of BREF and BAT in EU Member States (Austria, Czechia, Croatia, Spain and Ireland) related with the diverse aspects of cement production process and the use of waste in co-incineration (permitting, sampling, waste quality control, emission monitoring, safety management for hazardous waste, etc), including case-studies. The representatives of private industry present in the workshop shared their experience with co-incineration and measuring plant emissions. The presentations, in annex to this report and available in the EPPA website, provide detailed information for further study by the EPPA beneficiaries<sup>4</sup>. Nevertheless, some key conclusions of the Member State's experience were:

- In terms of general IED implementation:
  - Key aspect for successful implementation of IED / BAT conclusion is communication with relevant industry in advance and participation of national industry in BREF process.
  - The idea of BAT conclusions as standalone document, which can be used directly in permitting, is not working.
  - Final version of BREFs should be available as soon as possible. BREF in national language provides essential context for BAT conclusions and helps in successful implementation.
  - Guidance and supporting document for review procedures and / or extensive expert support for permitting authorities are necessary.
  - Higher compatibility with requirements of national legislation can reduce the burden of implementation.
- In terms of waste:
  - Waste prevention and preparation for re-use are addressed not specifically by the key requirements of the IED
  - Sorting and pre-treatment activities are partly addressed by the key requirements of the IED (see BREF waste treatment, e.g. shredder of metal wastes, pre-treatment of high calorific waste for incineration)
  - Recycling activities for recyclable waste streams are partly addressed by the key requirements of the IED (e.g. for waste streams serving as input for specific industrial sectors covered by the IED scope)
  - Thermal recovery activities are addressed by the IED (see BREF waste incineration and in case the waste stream is serving as input for specific industrial sectors covered by the IED scope)
  - Disposal activities are addressed not specifically by the key requirements of the IED
  - Even if treatment options for wastes are established in European Countries, the shift from thermal recovery to recycling brings up huge challenges

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<sup>4</sup> <https://eppanetwork.eu/taix-eppa-regional-workshop-on-industrial-emissions-directive-2/>



- The new Circular Economy Action Plan and the European Green Deal promote measures on material recycling throughout defining targets and strategies to enable higher uptake of recycling
- Uptake of all steps of the waste hierarchy in national implementation of waste legislation and sectoral legislation such as the IED Directive and related application of Best Available Techniques will support the shift to a circular society
- In terms of the permitting process:
  - It is recommended to include EIA in permit procedures
  - Offer BAT guidance
  - Create national emission ceilings for water, air and land
  - Identify the relevant principle environmental issues as soon as possible in the IED permitting process and ensure the operator thoroughly and comprehensively addresses these topics in their IED application.
  - Preparation and presentation of a good quality IED application will make the competent authority assessment process much more straightforward.
  - The EIAR (Directive 2014/52/EU) is one of the more important supporting documents in the IED permitting process and the competent authority should ensure that each of the environmental factors are adequately identified, described and assessed in the documents. In addition, where significant adverse effects on the environment are identified the developer shall provide mitigation measures in order to avoid, prevent or reduce and, if possible offset, these likely significant effects. The IR should identify where these mitigation measures have been addressed/conditioned in the licence/permit. Following examination of the EIAR the competent authority shall reach a “reasoned conclusion” (for each environmental factor) on the significant effects of the project on the environmental.
  - The competent authority should ensure that all of the EU legislative requirements, in addition to national legislative requirements are addressed in the Inspectors Report and license/permit as appropriate.
  - The competent authority shall ensure that each of the BAT Conclusions has been addressed and conditioned in the permit. (It is useful to pinpoint how and where they have been addressed in the permit, within the Inspectors Report).
  - The competent authority should engage external technical expertise to assist with assessing the IED application, as appropriate.
  - Be prepared for legal challenges to the permitting process where there is significant public interest and concern.

The event ended with an open discussion about the cement industry, waste incineration and co-incineration. The participants agreed that further efforts are needed in the enforcement of the IED, namely through the systematic control and analysis of each shipment of waste used in co-incineration, ensuring accurate monitoring of emissions into the atmosphere, and evaluation and control of the quality of the surroundings of the industrial facility. Moreover, and although co-incineration is not a priority on the waste hierarchy, it could be a convenient complement to a mechanical waste treatment plant designed for the recovery and reuse of different waste streams and it would allow an effective reduction of landfilling. The economies of scale will allow a higher level of emissions control and stricter environmental standards. In general, waste incineration is an effective but expensive way of treating waste. In waste incineration polluting substances such as heavy metals are removed from the environment via ash and slug. In waste co-incineration in cement plants, heavy metals will be transferred to the clinker and thus not removed from the environment. In addition, mercury removal is less effective in cement plants compared to waste incineration plants. But it is important to consider that they are not specifically designed to manage waste and therefore there is a possibility of lower emission control.

The participants also took note of the additional permit conditions, after entry into force of the EU decision on incineration (December 2023), including more restrictive ELVs (emission limit values) for pollutants, new BATs (best available techniques) required, and implementation challenges for



environmental authorities, who will have a hard task reviewing and updating the current permits and enforcing them.

### **Workshop outputs**

The workshop's main outputs were:

- Strengthened capacity to address the implementation challenges of the IED
- Raised awareness on the latest policy developments (like a probable review of the IED) and tools related to the IED
- Exchanged experiences in the implementation of the IED between EU Member States and the EPPA beneficiaries
- Increased regional dialogue on the implementation of the IED
- Identified national obstacles towards the implementation of the IED
- Better awareness of the enforcement challenges related to the cement industry and the benefits and disadvantages of waste incineration and co-incineration

## **3 Evaluation**

The participants were asked to evaluate the workshop by TAIEX using an online survey after the event. The evaluation results are presented below in a summary table.



			No. Responses	Expert Score	Yes / Excellent	No / Good	Partially / Satisfactory	
80631	Workshop - participant - A. Questions	1	19	19 (100%)	-	-	-	
		2	19	19 (100%)	-	-	-	
		3	19	18 (95%)	-	1 (5%)	-	
		4	19	16 (84%)	-	3 (16%)	-	
		5	19	17 (89%)	-	2 (11%)	-	
		7	19	15 (79%)	4 (21%)	-	-	
		8	19	17 (89%)	2 (11%)	-	-	
		Workshop - participant - B. Expert ratings	Mr. Dimovski, Mihail - Other speakers	18	93.05%	13 (72%)	5 (28%)	-
	Mr. Nagl, Christian - Other speakers		18	95.83%	15 (83%)	3 (17%)	-	-
	Ms. Pokrovac Patekar, Anita - Speaker MS		18	93.05%	13 (72%)	5 (28%)	-	-
	Mr. Jose Francisco, Alonso - Speaker MS		18	91.66%	12 (67%)	6 (33%)	-	-
	Mr. Salgado Blanco, Manuel - Speaker MS		18	94.44%	14 (78%)	4 (22%)	-	-
	Mr. Neubauer, Christian - Speaker MS		18	94.44%	14 (78%)	4 (22%)	-	-
	Ms. Schindler, Ilse - Speaker MS		18	93.05%	13 (72%)	5 (28%)	-	-
	80631	Workshop - participant - B. Expert ratings	Mr. Bennett, Michael John - Speaker EU	18	91.66%	12 (67%)	6 (33%)	-
Mr. Kovacevic, Nikola - Speaker PP			18	91.66%	12 (67%)	6 (33%)	-	-
Mr. Reisinger, Hubert - Speaker MS			18	91.66%	12 (67%)	6 (33%)	-	-
Mr. Slavik, Jan - Speaker MS			18	90.27%	11 (61%)	7 (39%)	-	-
Mr. Sweeney, Patrick - Speaker MS			18	90.27%	11 (61%)	7 (39%)	-	-
Mr. Zarger, Benoit - Speaker EU			18	91.66%	12 (67%)	6 (33%)	-	-
Ms. Bizonova, Gabriela - Speaker MS			18	90.27%	11 (61%)	7 (39%)	-	-
Ms. Danner, Monika - Speaker MS			18	90.27%	11 (61%)	7 (39%)	-	-
Ms. Fallmann, Katharina - Speaker MS			18	94.44%	14 (78%)	4 (22%)	-	-
Ms. Smokovic, Aleska - Speaker PP			18	90.27%	11 (61%)	7 (39%)	-	-
Workshop - participant - C. Logistic Ratings			1	8	7 (88%)	1 (13%)	-	-
		2	7	7 (100%)	-	-	-	
		3	2	-	2 (100%)	-	-	
		4	2	-	2 (100%)	-	-	
5		2	-	2 (100%)	-	-		
6	13	12 (92%)	1 (8%)	-	-			
7	10	9 (90%)	1 (10%)	-	-			
8	17	17 (100%)	-	-	-			
9	18	18 (100%)	-	-	-			
10	17	17 (100%)	-	-	-			
11	17	15 (88%)	1 (6%)	1 (6%)	-			
80631	Workshop - participant - D. Comments	-	-	-	-	-	-	
	Workshop - speaker - A. Questions	According to me, this event is very successful. One of the best organized from TAIEX EPWA. The workshop was very useful. The event was very well organized, had described in detail all the problems and the way of treatment and functioning in the countries that were part of this organization.	-	-	-	-	-	
		1	11	11 (100%)	-	-	-	
		2	11	11 (100%)	-	-	-	
		3	11	11 (100%)	-	-	-	
		4	11	8 (73%)	-	3 (27%)	-	
		5	11	9 (82%)	-	2 (18%)	-	
		6	11	3 (27%)	7 (63%)	1 (9%)	-	
		7	11	8 (73%)	-	3 (27%)	-	
	Workshop - speaker - C. Logistic Ratings	1	3	3 (100%)	-	-	-	
		6	9	9 (100%)	-	-	-	
		7	8	8 (100%)	-	-	-	
	Workshop - speaker - D. Comments	8	9	9 (100%)	-	-	-	
		9	8	8 (100%)	-	-	-	
		10	9	9 (100%)	-	-	-	
11		8	8 (100%)	-	-	-		
-	The answer options "not applicable" and "do not know" should be added to this questionnaire. This conference open up other new interesting issues for discussion and analyses in the future. Also I found a lot of interesting inspiration for my work. Thanks a lot for being a part.	-	-	-	-	-		

## Endnotes

\* This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

## Annexes

- Annex 1: Agenda (provided as a separate document)
- Annex 2: List of Participants (provided as a separate document)
- Annex 3: Presentations (provided as a separate document)



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