

# IPPC

## THE RAPPORTEUR'S KEY ISSUES

**SLIDES PROVIDE DETAILS ON:  
THE EUROPEAN SAFETY NET  
THE BRUSSELS PROCESS**

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## THE RAPPORTEUR'S KEY ISSUES

- ▶ **THE EUROPEAN SAFETY NET: RELIABLE EMISSION LIMIT VALUES WITHOUT DEROGATIONS**
- ▶ **FLEXIBILITY FOR AUTHORITIES: BREF IS THE REFERENCE FOR AUTHORITIES WHEN GRANTING PERMISSIONS; ESN IS NEVER TO BE EXCEEDED**
- ▶ **SEVILLA + BRUSSELS PROCESS: NO INTERFERENCE BETWEEN DESCRIPTION OF BAT AND DEFINITION OF EMISSION LIMIT VALUES**
- ▶ **CUT COMITOLGY: TAKE DECISIONS IN OPEN AND TRANSPARENT PROCESSES**
- ▶ **CUT BUREAUCRACY: LET COMPANIES DO WHAT THEY KNOW BEST**

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## UNEVEN IMPLEMENTATION OF BAT

- ▶ THE WORST CASE: PERMITS ARE ISSUED WITHOUT REGARD TO BAT
- ▶ NEGATIVE IMPACT ON ENVIRONMENT

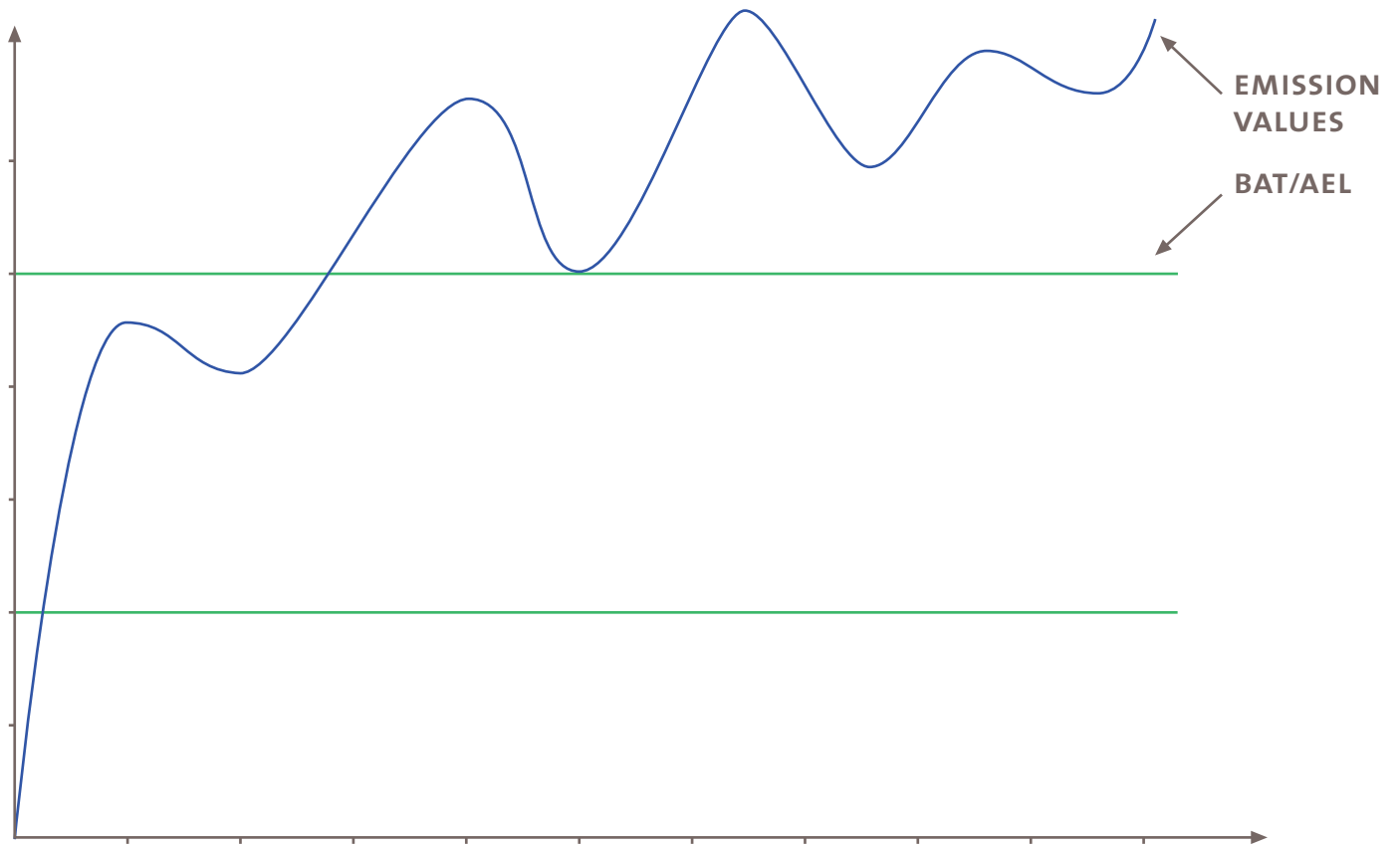


ILLUSTRATION - NO REAL VALUES!

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## THE IDEAL CASE – WITH EUROPEAN SAFETY NET

- ▶ PERMIT ISSUED ON THE BASIS OF BREF
- ▶ EMISSIONS UNDER NORMAL OPERATING CONDITIONS WITHIN BAT/AEL
- ▶ FLEXIBILITY GRANTED FOR ISOLATED PEAK EMISSION LEVELS

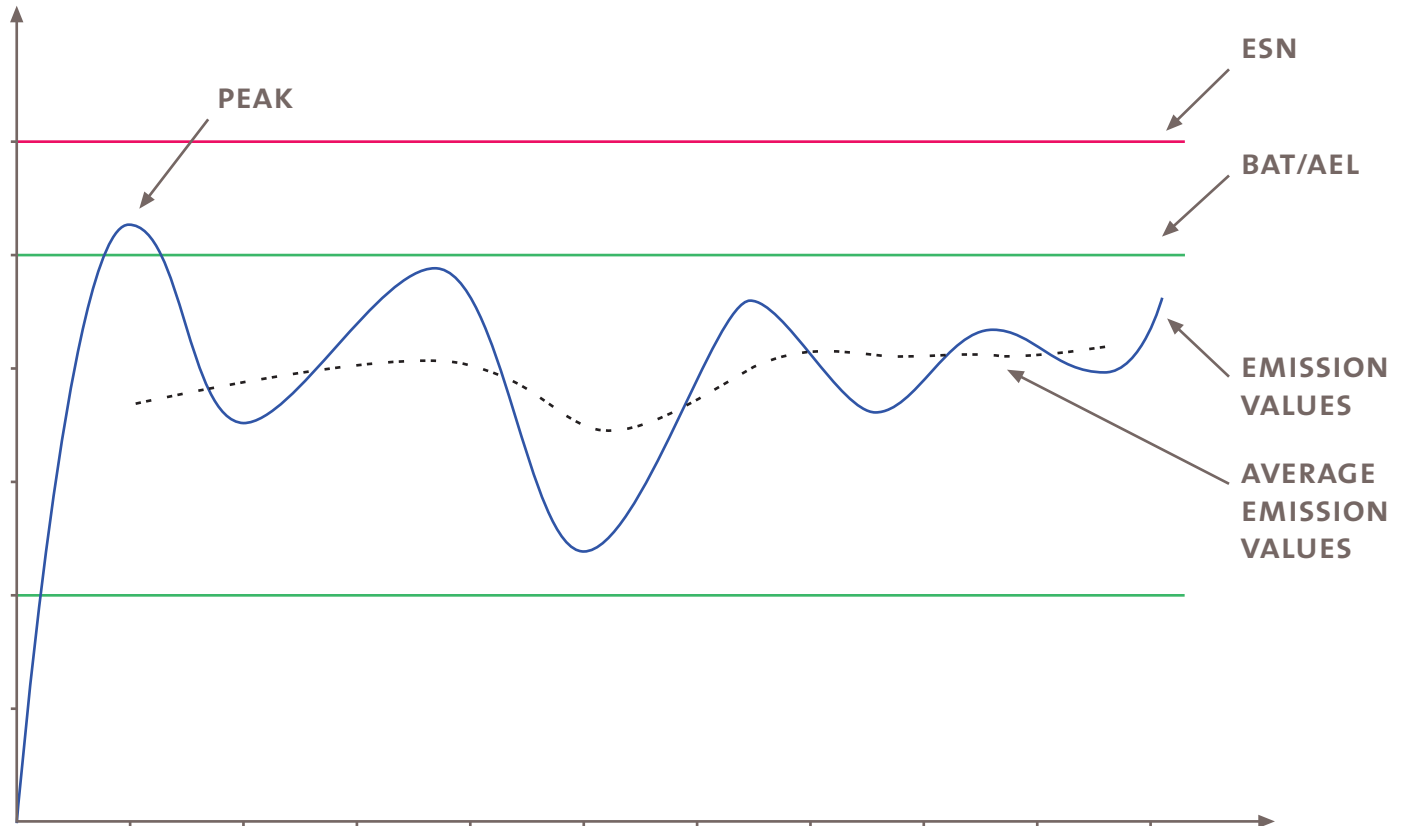


ILLUSTRATION - NO REAL VALUES!

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## THE EUROPEAN SAFETY NET PROVIDES RELIABLE LIMIT VALUES

- ▶ **NO VIOLATION OF THE ESN ALLOWED**
- ▶ **IN CASE OF NON-COMPLIANCE MEASURES HAVE TO BE TAKEN OR THE INSTALLATION CAN BE SHUT DOWN**

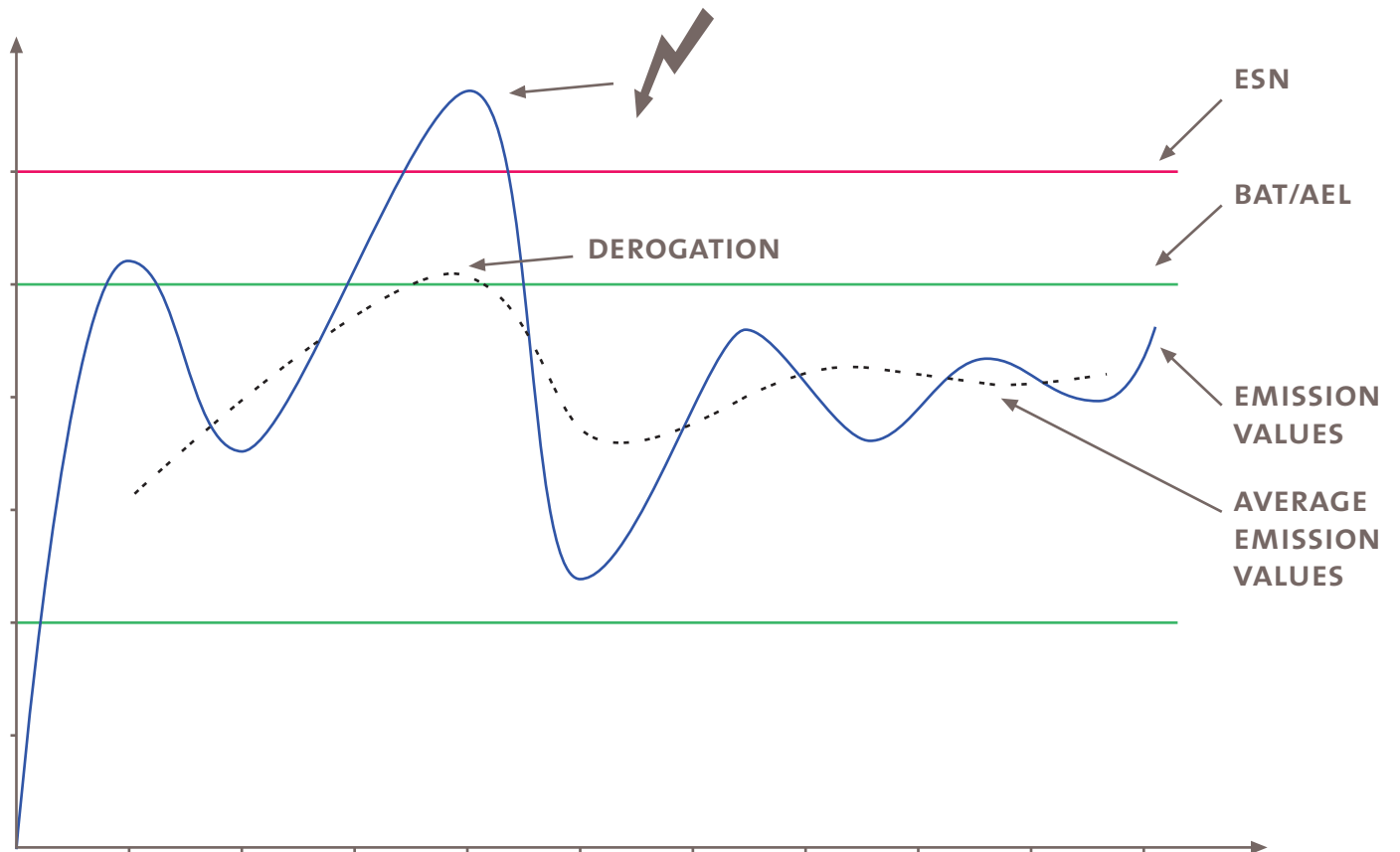
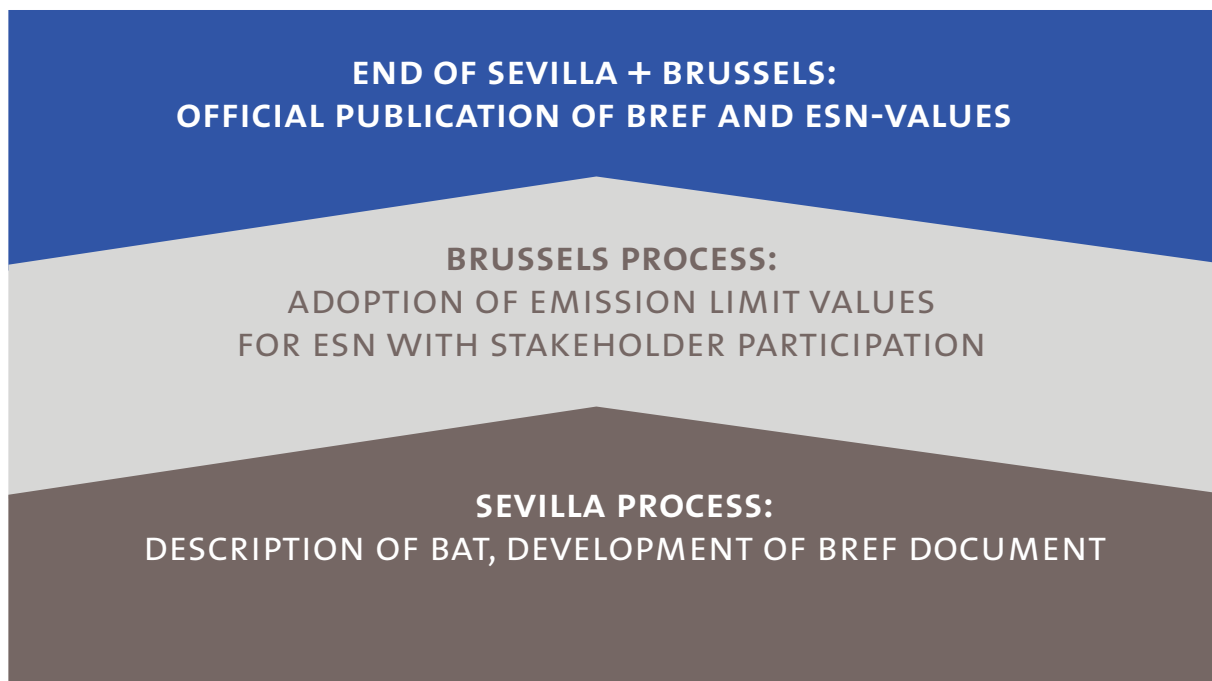


ILLUSTRATION - NO REAL VALUES!

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## SEVILLA + BRUSSELS PROCESS

- ▶ **LEAVE SEVILLA PROCESS FOR THE DESCRIPTION OF BAT UNTOUCHED:** DERIVATION OF ELV FROM BAT/AEL WOULD ALTER SEVILLA PROCESS NEGATIVLY
- ▶ **ASSIGN DEFINITION OF ELV TO ANOTHER BODY – COMITOLGY WITH SCRUTINY ("BRUSSELS PROCESS")**
- ▶ **BRUSSELS PROCESS HAS TO BE TRANSPARENT AND OPEN FOR EXTERNAL EXPERTISE**



**THANK YOU  
FOR YOUR  
ATTENTION!**