Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

Waste Treatment BREF – Draft 1

FEAD general comments

18 March 2016

These are FEAD's general comments on the first draft (D1) of the Waste Treatment BREF as published by the European IPPC Bureau (EIPPCB) on 18 December 2015. For our detailed comments, please refer to BATIS.

SECOND DRAFT

The Waste Treatment BREF is complex, considers very different treatments and proposes a high number of Best Available Techniques (BAT). The document is expected to have a huge economic impact on the activities of our members.

Therefore, **FEAD calls upon the EIPPCB to envisage a second WT BREF draft**. In the process of adopting a new Waste Treatment BREF, circulation of a second draft of the document would give the Technical Working Group the opportunity to analyse the amended proposal of the EIPPCB taking into account the significant number of important comments presented on the first draft.

The EIPPCB could also consider sharing with the Technical Working Group (TWG) individual chapters of the WT BREF as soon as these chapters have been revised, as it has previously been done for other BREF revisions. This process may facilitate the discussions in the TWG.

Last but not least, **FEAD supports the idea of having a data assessment workshop** to assess the accuracy of the data collected for the revision process.

BAT-AEL DERIVATION METHOD

The methodology for deriving BAT-AELs from measured values should be scientifically sound and transparent. There is a clear distinction between measured values from an operating plant and a BAT-AEL. **When deriving a BAT-AEL from measured values, the following aspects have to be take into account**:

- The variation of values in operation;
- The level of uncertainty of the measurements;
- The lack of harmonised sampling methods;

All aspects which make it difficult to compare reported values. Also the **detection limit** of the instruments used to measure emission values should be taken into account. If the proposed BAT-AELs are below the detection limit, operators will not be able to provide reliable measurements and hence it will not be possible to prove compliance.

The guiding principle for deriving BAT-AELs should be that **plants operating under normal operating conditions and applying BAT should be able to comply with the proposed BAT-AELs**. Unfortunately from our own assessment we found that a number of plants report emission levels which are not within the proposed BAT-AEL ranges and often exceed the

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higher range of the BAT-AEL. In many cases, the sample of plants which have been considered to derive a BAT-AEL are not representative for all plants operating in the EU.

MONITORING FREQUENCIES

D1 sets strict monitoring requirements for a wide range of pollutants, with a very high monitoring frequency. FEAD believes that the **cost of implementing the proposed monitoring requirements would be disproportionate** to the added environmental value, which should be the guiding principle of all the proposed BAT Conclusions.

The **minimum monitoring frequency should at least be reduced from once a day to once a week and from once a week to once a month for the water parameters and from once every three/six months to once every year for the air parameters**, with the possibility for an even lower monitoring frequency if the data series clearly demonstrate a sufficient stability of emissions over time. Higher monitoring frequencies would in this case significantly increase operational costs without bringing environmental improvements.

ECONOMIC VIABILITY, COST-EFFICIENCY AND CROSS EFFECTS

Cost efficiency should always be considered when proposing a BAT/BAT-AEL: D1 however only considers the costs of specific techniques but does not put them in relation to their envisaged environmental benefits. Techniques should only be made compulsory if their contribution to the environment is proportionate to their economic cost.

Following the BREF Guidance Document[1], 'available techniques' means: *"those developed on a scale which allows implementation in the relevant industrial sector, under **economically and technically viable conditions**, taking into consideration the **costs** and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are **reasonably accessible** to the operator"*.

In addition, *"in the process of establishing these BAT conclusions, the overarching criteria of the environmental performance of the techniques, including cross-media implications, as well as their costs, are considered in relation to the industry sector."* It should be kept in mind that with a certain technique it may be possible to abate emissions from one pollutant, but that **it will rarely be possible to control all pollutants at the same time due to cross effects**. Also this should be taken into account when proposing BAT-AELs (which is clearly not the case e.g. for the water emission parameters proposed).

About FEAD

FEAD, the European Federation of Waste Management and Environmental Services, represents the private waste management industry in Europe. FEAD's members are national waste management associations covering 18 EU Member States, Norway and Serbia. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion.

FEAD represents about 3,000 companies with activities in all forms of waste management. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems and in returning valuable secondary raw materials to the European economy.

[1] Commission Implementing Decision of 10 February 2012 laying down rules concerning guidance on the collection of data and on the drawing up of BAT reference documents and on their quality assurance referred to in Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2012.063.01.0001.01.ENG