

Industry stakeholders participation to IED Article 13 Forum

Eurelectric comments

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: -

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- **Does the Forum as it is represent “a balanced representation of relevant know how and areas of interest”?**

Yes, it is important to have a broad representation of industry in order to provide expertise on the number of sectoral and horizontal BREFs, and on the overall implementation of the Industrial Emissions Directive. Industry expertise is crucial in the BREF process. Moreover, while the industry membership in the Forum is large this may be explained by differences in interests. Actual attendance and participation to the meetings is much lower and as such well-balanced. An assessment based on the membership list alone would be misleading.

- **To assist the Commission with the BREF process, is it necessary for Forum members to attend a certain proportion of meetings?**

Yes, the discussions and decisions for one BREF can set precedents for other BREFs. Industry representatives need to be familiar with the proceedings ahead of any relevant BREF for their sector being submitted for the Forum’s opinion.

- **Does the variation in frequency of attendance to Forum meetings reflect different interests, i.e. contributing to the work of the Forum as a whole or to only specific BREFs?**

The crucial aspect of Forum membership is the ability to nominate experts in Technical Working Groups: this should be left open to all industry associations that represent the relevant interests in relation to the important and varied number of BREFs in the scope of the IED. Then participation to the article 13 Forum should be expected to change according to the BREFs on the work programme at a given time (certain members will only join ahead of relevant BREFs). Stakeholders’ interest and resources for general/horizontal IED issues will also differ.

- **How should we ensure that: “Members who are no longer capable of contributing effectively to the forum's deliberationsmay be replaced.”**

Membership could be updated every year in order to check if stakeholders still want to be members of the Forum.

- **Since proof of a direct relation with another Forum member is a ground for rejecting new applications, shouldn't this also apply for existing members?**

Please clarify, what a “direct relation” is.

- **To address the issues identified, and improve the functioning of the Forum and assist in fulfilling its mandate, could it make sense to have two categories of Forum member? One category could be those that intend to attend the majority of meetings and are thus able to give their opinion to the Commission on the practical arrangements – the BREF process. This could help make the forum more effective and improve its balance. The other category would be occasional members who have an interest in specific BREFs, in particular to ensure they can nominate participants in the relevant TWG.**

In practice this distinction already exists as evidenced by the difference between the industry stakeholders registered as Forum members and those actually attending the meetings. Web streaming of the meetings could solve any logistics problems associated with a high participation rate although the adoption of the opinion of the Forum for certain BREFs may attract a –justified- high number of industry stakeholders (e.g. LCP BREF).

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

Growth, added-value, efficiency

Environmental Leadership

■ Commitment, innovation, pro-activeness

Social Responsibility

■ Transparency, ethics, accountability



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