

# Public consultation on IED & E-PRTR Revision

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A Eurelectric response paper

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.

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March 2021

## KEY MESSAGES

Eurelectric supports ambitious health and environmental policies in Europe. The power sector has, over the last decades, undertaken drastic efforts to reduce its non-CO<sub>2</sub> emissions and significantly limit its air pollution. For instance, between 2005 and 2018, emissions of SO<sub>2</sub> and NO<sub>x</sub> by the electricity industry fell by 85% and 58% respectively, while direct emissions of PM<sub>2.5</sub> were reduced by 65% (source: EEA, Informative Inventory Reports of Member States – sector 1A1a). These impressive reductions took place while electricity generation remained stable over the same period. Over the next decade, recently agreed source-specific European legislation for the energy sector (namely the ongoing implementation of the Best Available Techniques Reference Documents for Large Combustion Plants (BREF LCP) and Waste Incineration (WI) and the Medium Combustion Plant (MCP) Directive) will lead to further significant emission reductions. Our sector intends to pursue and even accelerate this contribution to improving air quality across Europe: the power sector is committed to accelerate the clean energy transition and to achieve carbon-neutral electricity mix in the EU by 2045, while ensuring that security of supply is maintained and recognising the increasing challenges for thermal generation. Therefore, additional emission reductions are expected in the next 10 years and beyond, driven by the implementation of the climate and energy policy, the continued desire to invest in carbon-free generation by European utilities and the industrial emissions/air quality framework.

From the power sector's perspective, the existing IED and the associated dynamic BREF process have been suitable and reliable tools for improving health and environmental quality in Europe. The planned revision should build on the existing framework and experiences and develop it gradually to improve harmonised implementation, streamline the BREF processes, and make plant permitting and inspections more efficient and less burdensome for operators and competent authorities. The technical Annexes of the IED such as Annex V do not need to be revised, but should be kept as a safety net of minimum requirements.

### **There must be no double regulation of GHG emissions**

Consistency with the updated EU's 2030 energy and climate policy and its implementation timeline is crucial to achieve better environment and human health in a cost-effective approach. In particular, the power sector wants to emphasise that, according to article 9.1 IED, “[w]here emissions of a greenhouse gas from an installation are specified in Annex I to Directive 2003/87/EC in relation to an activity carried out in that installation, the permit shall not include an emission limit value for direct emissions of that gas, unless necessary to ensure that no significant local pollution is caused”. Decarbonisation of industry, including the power sector, is driven by the climate and energy policy framework, in particular the

ETS. The role of the IED is to ensure high standards of environmental protection and industrial emissions reduction, in particular for local pollutants, and not to drive decarbonisation. However, greenhouse gases emissions of IED activities which are not covered by the ETS Directive can already be addressed in the frame of the IED. For instance, the LCP BREF and its BAT conclusions (Commission Implementing (EU) Decision 2017/1442) include methane slip values for reciprocating engines and measuring obligations for nitrous oxide from fluidised bed boilers. Against this background, the revision of the IED should not establish standards for CO<sub>2</sub> emissions for installations covered by the ETS, like those of the power sector.

Similarly, article 9.2 IED adds that “[f]or activities listed in Annex I to Directive 2003/87/EC, Member States may choose not to impose requirements relating to energy efficiency in respect of combustion units or other units emitting carbon dioxide on the site”. IED contains general provisions on energy and specifies that BAT should include consideration on this so although the IED should not be the primary vehicle its provisions ensure a holistic approach is taken to the “environment as a whole”. The LCP BREF also contains non-binding design values on energy efficiency. However, there should not be mandatory BAT-AELs for energy efficiency as this could jeopardise the operability of plants.

## **A lower threshold would add costs with little environmental benefit**

Eurelectric is concerned that the current 50 MWth threshold for the application of the IED could be lowered. Although the alignment with the ETS threshold (20 MWth) might seem like a logical step, installations in this segment (20-50 MWth) under these two instruments would follow different rules (in particular on aggregation) and answer to different objectives (decarbonisation and pollution impact). This would increase administrative burden on smaller combustion plants with the possible additional burden of CO<sub>2</sub> limit for plants not included in the scope of the ETS.

The MCP Directive already adequately fills the regulatory gap at EU level between large combustion plants (> 50 MWth) covered by the IED and smaller appliances (heaters and boilers <1 MWth) covered by the Ecodesign Directive. Expected reporting from the Member States and the Commission will allow for an assessment of the progress made through the implementation of the MCPD. There are also specific review clauses to address other issues such as energy efficiency and carbon monoxide emissions.

## **A better consistency between averaging periods for emissions from Large Combustion Plants (LCPs)**

The BAT conclusions for LCPs (Commission Implementing (EU) Decision 2017/1442) use different averaging periods than the ones used for emission limit values that are set in the IED's Annex V (yearly and daily in the BAT conclusions and monthly and hourly in IED's Annex V). The power sector had advocated for an alignment of the averaging periods in the BREF and BAT conclusions with the ones used in the IED. However, we are reaching the end of the four years competent authorities had to reconsider permit conditions following the adoption of the BAT conclusions in 2017. Therefore, competent authorities and operators have devised ways to accommodate these discrepancies as needed. While a guidance would be useful, changing the values in Annex V for that reason should be considered very carefully. Indeed, BAT-AELs ranges and emission limit values in IED's Annex V don't fulfil the same role. For the revision of the IED it will be crucial to ensure that it remains suitable for the future and can accommodate the changing role of combustion plants in the energy system.

## Preserve flexibility embedded in IED for site specific reasons

BAT-AELs are legally binding and are frequently expressed as ranges in BREFs/BAT conclusions. This is a sensible choice as BREFs can't have perfect solutions for all plants across all Member States. This is also a beneficial solution for the environment as it takes into consideration cross-media effects (for instance a process can have higher NOx emissions but be more efficient and emit less CO2). Eurelectric wants to highlight that the IED definitions of "best available techniques"<sup>1</sup> and "available techniques"<sup>2</sup> remain completely valid. This means that it is not possible to use the lower limit of the BAT-AEL range as the default option for setting ELVs in permits. Moreover, it is, by definition, not possible to derive emission levels associated with "emerging techniques"<sup>3</sup> as there will not be sufficient and reliable data available.

Article 15.4 IED also clearly allows for derogation because the geographical location or the local environmental conditions of the installation concerned or the technical characteristics of the installation concerned would lead to disproportionate costs compared to the environmental benefits. In the case of LCPs, this derogation is allowed within the limits set in IED's Annex V. While the perception of cost-benefit can change over time, it is important that the long investment cycles in the industry are respected. Besides, the cycle of revision for BREFs leads to new BAT conclusions and reconsideration of permits on a regular basis showing that the IED permitting system is a dynamic one. This would also allow competent authorities to support operators as they face the evolution of the electricity system which is likely to require more flexibility going forward.

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<sup>1</sup> Article 3.10 IED: 'best available techniques' means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing the basis for emission limit values and other permit conditions designed to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole (...).

<sup>2</sup> Article 3.10 (b) IED: '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.

<sup>3</sup> Article 3.14 IED: 'emerging technique' means a novel technique for an industrial activity that, if commercially developed, could provide either a higher general level of protection of the environment or at least the same level of protection of the environment and higher cost savings than existing best available techniques.

\*Contribution ID: f74bb5d5-65cb-4d4f-a56d-7c3c9f1484e2

Date: 23/03/2021 19:38:36

# IED-EPRTTR-Revision-OPC-2020

Fields marked with \* are mandatory.

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## Survey for Public Consultation

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### Introduction: European Green Deal, and the Role of Industry in Cleaning and Greening the EU

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The European Green Deal sets the overall strategy on dealing with climate-related and wider environmental challenges whilst achieving “greener” EU economic growth.

In parallel, the Industrial Strategy for Europe highlights the need for new processes and technologies, innovation and investment to strengthen our industrial competitiveness and facilitate industry’s shift to a climate neutral, clean and circular economy.

Since 1996, integrated pollution prevention and control (IPPC) methodologies and legislation has been the way in which the EU’s Member States have issued environmental permits to govern the operation of larger industrial plants. The latest version of the EU legal rules is called the Industrial Emission Directive (IED) - Directive 2010/75/EU. The IED is effective in controlling pollution to air, water and soil from larger industrial and agricultural plants in an integrated way, and in pushing forward the incorporation of innovative “Best Available Techniques” [1]

Working hand-in-hand with the IED, the European Pollutant Release and Transfer Register (E-PRTR) Regulation (EC) 166/2006 (as amended) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

#### **The new European Green Deal and the Zero Pollution Ambition for Europe**

The European Green Deal, adopted in December 2019, seeks to go way beyond the current policies to control emissions to air, water and soil. It sets out a long-term pathway to 2050, to ensure a climate-neutral, clean and circular economy, optimising waste management and minimising pollution over this timeframe.

The Green Deal commits inter alia to:

1. adopting an action plan towards a zero pollution ambition. Separate consultations on the Zero Pollution Action Plan initiative are ongoing.
2. revising EU measures to address pollution from large industrial plants, including both the IED and the E-PRTR, to:

- Look at the sectoral scope of the legislation and at how to make it fully consistent with climate, energy and circular economy policies
- Ensure that industry sectors maintain their role in improving the EU's environment
- Increase the take-up by industry and agricultural sectors of novel and proven techniques to create a more sustainable EU economy, at the same time as achieving a cleaner environment that improves public health
- Improve public access to environmental information.

The scope of the revisions mentioned above are summarised in two brief documents: the IED inception impact assessment and the E-PRTR inception impact assessment.

### **The IED (Industrial Emissions Directive) – in more detail**

The IED controls the environmental impacts of over 50,000 of the larger-scale agricultural and industrial activities in an integrated manner, to achieve a high level of protection of the environment. Activities regulated by the IED include power plants, refineries, waste treatment and incineration, production of steel, non-ferrous metals, cement, lime, glass, chemicals, ceramics, pulp and paper, food and drink, as well as the intensive rearing of pigs and poultry.

National authorities are obliged to issue permits for plants conducting activities under the scope of the IED, with permit conditions based on the use of Best Available Techniques (BAT). To ensure a consistent EU approach, sectoral BAT reference documents (BREFs) – tailored to each agricultural or industrial activity - are produced via EU-wide assessment with Technical Working Groups whose members include environmental and civil society NGOs, industry associations, EU Member States and the European Commission. So-called 'BAT conclusions' derived from these discussions, are then formally adopted into EU law and are binding. EU Member States' permitting authorities must use these as the reference when setting permit conditions.

**The IED was evaluated earlier in 2020** to check how it was functioning. Findings from this evaluation included:

- Pollution is still occurring across the EU from large (agro)industrial plants (including emissions to air, water and soil; and use of harmful substances)
- Extending the IED to other sectors or activities could be appropriate, or thresholds at which plants become subject to the IED might be changed, in order to reduce significant pollution
- Member States are implementing EU IED requirements in a heterogeneous manner, including the stricter BAT conclusions measures. The result is that the environmental ambition varies across the EU's Member States
- Further efforts could be made to support the decarbonisation efforts of large-scale industries and agricultural activities as a whole
- Large industrial and agricultural facilities could contribute more to a circular economy, and their exploitation of natural resources could be reduced
- The IED may be able to more proactively promote new production processes, technologies and innovation
- Greater coherence and synergies with other EU legislation (e.g., the Emissions Trading System, the Landfill Directive and waste management opportunities) could be exploited.
- There is insufficient public access to information, participation in decision making and access to justice with regard to permitting decisions and revisions.

## **The European Pollutant Release and Transfer Register (E-PRTR)**

The E-PRTR is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The register contains data reported annually by some 30,000 industrial facilities covering 65 economic activities across Europe, and complements the IED. It should be noted that some activities are covered by E-PRTR but not by IED (e.g. mining).

The E-PRTR registry contains details at Member State level of plants and related pollution/ discharges information throughout the EU, also enabling searches on individual or groups of pollutants to be made, including heavy metals, pesticides, greenhouse gases and dioxins for the year 2007 onwards. Some information on releases from diffuse sources is also available. Member States update the register's website annually.

The E-PRTR contributes to transparency and public participation in environmental decision-making. It implements, for the European Union, the UNECE (United Nations Economic Commission for Europe) PRTR Protocol to the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

An evaluation of the E-PRTR concluded in 2016 that whilst the E-PRTR Regulation was very much fit for purpose, some elements could be improved, e.g. in areas where there were opportunities for simplification and cost savings, and where the scope of the current Regulation could be extended to improve coherence with the following policy areas:

- the IED (for some industrial activity definitions, and for the Large Combustion Plant inventory)
- EU waste law (e.g. level of detail required for waste types when reporting transfers, and risk of discrepancies in reporting, depending on whether the waste is being treated, or disposed of)
- the Emissions Trading System (and differences in activities and thresholds)
- water legislation (and emission to water reporting requirements); and
- the INSPIRE (INfrastructure for SPatial InfoRmation in Europe) directive, relating to the interoperability of spatial datasets.

## **Your role – what you can do to help us ... and the EU**

The purpose of this consultation is to gather the views of the public on revising the IED and E-PRTR.

First of all, we would like to enlist your help in understanding existing problems better. Secondly, we are trying to identify policy options to address these problems efficiently, clearly and coherently.

We are conducting the work on Impact Assessment to possibly revise the IED and the E-PRTR in parallel, to make the process more coherent and streamlined.

### **Content of this consultation**

The consultation is divided into three parts:



- Part 1 - asks for some information about you (such as which country you come from).
- Part 2 - aims to gather information on general awareness and views of the impact of large (agro)industrial plants on the environment and the measures to manage it. The questions are aimed at the general public, and do not require any particular specialist knowledge, solely an interest in the area.
- Part 3 - contains more detailed questions – it is addressed to those persons with more experience/ expertise in the area, who may wish to comment in greater depth on the impact of large (agro) industrial plants on the environment and the measures to manage it in the revisions under consideration. (Please also note that there will be also be a follow-on Targeted Stakeholder Survey for experts, and other general/ specific consultation opportunities via stakeholder meetings – see below).

Part 3 gives you the opportunity to let us know if you wish to take part in the follow-on Targeted Stakeholder Survey, and also to join in more detailed focus groups, interviews and stakeholder consultations.

At the end of the questionnaire, you are also able to upload one document (e.g. technical information, Position Paper, etc) supporting and detailing your views. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

All responses to this consultation will be assessed and the results will be included in the analysis supporting our next steps. We will also produce a stand-alone factual summary on the input received, as well as a more detailed analysis of all consultation activities, which will be made available on the “Better Regulation” portal of the European Commission’s website in the 2nd Quarter of 2021. More detailed material gathered during the consultation exercise may be uploaded to the publicly-available area of the Commission’s “CIRCABC” library, and links to this will be provided to the general public.

If you have any questions, please contact the European Commission at this dedicated email address: [\*\*ENV-IED-REVISION@ec.europa.eu\*\*](mailto:ENV-IED-REVISION@ec.europa.eu)

Your opinion matters, and we are very grateful to you for taking the time to answer these questions.

*[1] Defined in Article 3 (10) of Directive 2010/75/EU as a combination of “best”, “techniques” and “available techniques”. Using this trio of conditions, the emphasis of the end result is (sensu lato) on achieving the most effective way of protecting the environment as a whole, under economically and technically viable conditions, and referring to the way in which the installation is designed, built, maintained, operated and decommissioned.*

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## Part 1 - About you

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Language of my contribution

English

I am giving my contribution as

Business association

First name

Helene

Surname

LAVRAY

Email (this won't be published)

hlavray@eurelectric.org

Organisation/association/institution/authority name

*255 character(s) maximum*

Eurelectric

Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

EU Transparency register number

*255 character(s) maximum*

Check if your organisation is on the transparency register (<http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>). It's a voluntary database for organisations seeking to influence EU decision-making.

4271427696-87

Country of origin

Please add your country of origin, or that of your organisation.

Belgium

Publication - privacy settings

The Commission will publish the responses to this public consultation. Please choose whether you would like your details to be made public or to remain anonymous.

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

**PLEASE TICK THIS BOX if you wish to remain Anonymous. We will only publish your type of respondent, country of origin and contribution. We will not publish any other details (name, organisation name and size, transparency register number, etc).**

**Public**

PLEASE TICK THIS BOX if you are happy to make your submission Public. We will publish your identification details (name, organisation name and size, transparency register number, country of origin) and your contribution.

- I agree with the personal data protection provisions ([https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement\\_en](https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_en))

## Part 2 – General awareness and views on the environmental impacts of agro-industrial activities

This section asks about your general awareness of industrial emissions policy and to gather general views on revising the Industrial Emissions Directive (IED) and European Pollutant Release and Transfer Register (E-PRTR) Regulation. In each question, please select the answer which best represents your views.

**Please note that you can choose to respond to this section - Part 2 – and then choose not to answer the following section (Part 3). NB Also, in either Part 2 or Part 3 – you do not need to answer all of the questions.**

1. How important are the impacts of large industrial plants and intensive agricultural installations on the following environmental issues? :

	Very Important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil pollution (contaminated land)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution of rivers, lakes and ground water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Depletion of natural resources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Perturbing natural habitats and ecosystems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other types of pollution or impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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If other please specify

300 character(s) maximum

The rating is from the perspective of the power sector but this will vary according to the sector in the scope of the IED.

2. Today, what is the contribution of large (agro)industrial plants to the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other issues, please specify

300 character(s) maximum

3. Post-2030, how important should the role be of large (agro)industrial plants for the following techno-economic and environmental objectives ? :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Achieving a climate-neutral economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting green growth	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a Circular Economy in the EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising pollution of soils, water and air in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising industry's emissions of greenhouse gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Minimising agriculture-related emissions of greenhouse gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising effects on nearby natural habitats and ecosystems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Minimising odour pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Facilitating other changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other changes, please specify them

300 character(s) maximum

The rating is from the perspective of the power sector but this will vary according to the sector in the scope of the IED.

4. In the place where you mostly live, work or study, are there:

	Please tick one
No large (agro)industrial activities (if so, you may wish to skip Questions 5, 6 & 7)	<input type="radio"/>
Relatively few large (agro)industrial activities?	<input type="radio"/>
Some large (agro)industrial activities	<input type="radio"/>
Medium levels of large (agro)industrial activities	<input type="radio"/>
High levels of large (agro)industrial activities	<input type="radio"/>
I do not know	<input type="radio"/>

5. With regard to available information on the level of environmental impacts of large (agro)industrial plants in your places of interest (place where you live, work or study), do you agree that:

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
You have access to sufficient information on the types of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
You have access to sufficient information on the level of environmental impacts of large (agro)industrial plants ?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

300 character(s) maximum

6. With regard to the granting, revision or enforcement of operating permits for large (agro)industrial plants in your places of interest (place where you live, work or study), how important is the principle that the public can find the information on the following questions... :

	Very important	Important	Neither important nor unimportant	Not so important	Hardly important	I don't know
Which authority is responsible for granting and enforcing permits for the operation of large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I participate in the granting or revision of permitting decisions for large (agro)industrial plants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How can I appeal against the granting of such permits, or appeal for them to be revised?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: You can provide reasons for the above answer

300 character(s) maximum

7. For your places of interest (where you live, work or study), can you find information on the following? :

	Yes	No	I don't know
New or recent environmental permit applications to operate large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental permits that have already been granted to operate large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance details for operators of large (agro)industrial plants with their environmental permit conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions monitoring data related to large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting information on environmental management performance of large (agro)industrial plants (e.g. resource consumption, energy use, greenhouse gas emissions, other)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT) for industry sectors / farming installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures and decisions related to the operation of large (agro)industrial plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**On behalf of the DG Environment IED Team, thank you very much for your time and your contribution!**

**NB PLEASE FEEL FREE TO STOP HERE, OR TO CONTINUE TO PART 3 (DETAILED QUESTIONS, requiring some specialised knowledge)**

If you have any questions, please contact the European Commission at this dedicated email address: [ENV-IED-REVISION@ec.europa.eu](mailto:ENV-IED-REVISION@ec.europa.eu)

## Part 3 – Detailed questions on revision of the IED and the E-PRTR

Part 3 seeks to gather more detailed views on revising the IED provisions and the E-PRTR. Please select the answer which best represents your views.

**Please note that you can choose to respond to Part 3 only. Not all questions need to be answered.**

8. Do you agree with the following statement, with regard to each environmental issue outlined below? “The existing Industrial Emissions Directive, supplemented by horizontal legislation (e.g., Framework Directives on Waste and Water, Emissions Trading System, etc) and guidance on operating large (agro)industrial plants, sufficiently controls environmental impacts from these installations regarding...” :

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Air quality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fresh water quality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine water quality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient water use in processes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficient energy use in processes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of greenhouse gases	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumption of raw materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Soil contamination	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Generation of waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitats and ecosystems, especially close to installations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fostering Circular Economy approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Odour emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other issues	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other issues, please specify them

300 character(s) maximum

9. For existing sectors covered by IED BREFs, to what extent do you agree that the following activities carried out at large (agro)industrial plants still have a significant negative impact on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy – large combustion plants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy – oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - iron and steel, and other ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry – glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Waste incineration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Independent industrial wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Slaughterhouses & animal by-products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ceramics industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive rearing of poultry or pigs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Do you think that the threshold for consideration under the IED should be reduced or modified for any of the above sectors? If so, to what level(s)? (500 character maximum limit)

*500 character(s) maximum*

The issue of hydrogen production through electrolysis in particular from RES may need particular attention at some stage to avoid burdensome permitting processes for this clean energy source that could delay its uptake in the energy sector. Note that to date there is no threshold for consideration under the IED for hydrogen production at industrial scale.

10. Looking at possible NEW sectors to be covered by the IED and the associated BREFs process, to what extent do you agree that the following additional activities need to be addressed by the IED in order to significantly reduce significant negative impacts on the environment and on human health?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Energy industries – medium combustion plants (i.e. under the IED, rather than via the existing Medium Combustion Plant Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Urban waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy – oil and gas extraction activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Landfills - management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Storage of Hazardous Substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other activities, please specify which

300 character(s) maximum

11. To what extent do you think that the functioning of these current IED procedures needs to be improved in the future to optimise them?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
Environmental permitting procedure to operate an (agro)industrial plant	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site inspections to ensure compliance with environmental permit conditions to operate an (agro)industrial plant	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting of emissions monitoring data related to compliance with environmental permit conditions to operate the (agro)industrial plant	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ease of obtaining information on what are considered to be best available techniques (BAT)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative and judicial review procedures related to the operation of large (agro)industrial plants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other issues - please specify which

300 character(s) maximum

On "Environmental permitting procedure to operate an (agro)industrial plant": shorter permitting procedures are necessary to be able to achieve better environmental protection and competitiveness.

12. How would you rate the functioning of the following aspects regarding the public's access to information in relation to agro-industrial activities and their impacts on the environment and on human health?

	Very easily available	Available moderately easily	Neither easily available nor difficult to access	Moderately difficult to access	Very difficult to access	I don't know

Information on IED permits already granted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information submitted by operators/ potential operators to competent authorities prior to IED permits being granted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the compliance of plants with IED permit conditions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions monitoring data from agro-industrial plants covered by the IED	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on best available techniques (BAT)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of BAT at the individual (agro)industrial plants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other public information areas related to plant covered by the IED	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental performance of large (agro)industrial plants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other public information areas, please specify which

300 character(s) maximum

13. To what extent do you think that enabling greater public participation in decision making in these current IED procedures needs to be improved in the future to optimise them, related to (agro)industrial activities and their impacts on the environment?

	No changes needed	Minor changes needed	Some changes needed	Many changes needed	System requires a complete overhaul	I don't know
IED permit applications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
BAT-AEL derogation on the grounds of geographical location, local environmental conditions or installation's technical characteristics – Article 15(4) of the IED	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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If other areas of public participation in IED decision making should be improved , please specify which  
 300 character(s) maximum

14. How would you rate the information provided in the E-PRTR regarding the environmental performance of large (agro)industrial plants?

	Very complete	Moderately complete	Neither complete nor incomplete	Moderately incomplete	Very incomplete	I don't know
Releases to air	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases to soil	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers of waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfers to waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to air	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diffuse releases to water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Releases of pollutants from accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production volume of the facility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other issues - please specify if other aspects of environmental performance should be covered by the E-PRTR

300 character(s) maximum

The rating is from the perspective of the power sector but this will vary according to the sector in the scope of the IED.  
 Other issue: impact of threshold.

15. How do you rate the search capability for information on industrial plant and agricultural operations in the E-PRTR? Do you consider that the following aspects work... ? :

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Search by - facility name	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by – industrial activity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by - pollutant	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Search by – geographical location	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other public information areas, please specify which

*300 character(s) maximum*

16. Going into sector-specific data in the E-PRTR, how would you rate the usefulness of the E-PRTR with regard to environmental performance data on these (agro)industrial sectors?

	Very satisfactory	Moderately satisfactory	Neither satisfactory nor unsatisfactory	Moderately unsatisfactory	Very unsatisfactory	I don't know
Energy – large combustion plants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy – oil refining, gasification and liquefaction, coke ovens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - iron and steel, other ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Metals production / processing - non-ferrous	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry processes - cement, lime, magnesium oxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mineral industry – glass, glass fibre, ceramics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Production of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-hazardous waste management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Waste incineration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wastewater treatment plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Production of pulp and paper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Textiles manufacturing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Food and drink production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive rearing of poultry or pigs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy use – medium combustion plants (i.e., via IED, rather than via existing MCP Directive)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intensive rearing of cattle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intensive aquaculture (fish or shellfish farming)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mining industries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other activities, please specify which

300 character(s) maximum

17. Thinking in more detail about the pollutants covered by the E-PRTR:

a) Are there any pollutants that should be removed from the E-PRTR?

b) Are there any pollutants that should be added to the E-PRTR?

c) Are there existing E-PRTR pollutants, or their reporting thresholds, that should be amended? Please specify which

300 character(s) maximum

18. How well does public access to justice function in relation to (agro)industrial activities (e.g., siting of plant, operating permits etc)?

	Very well	Moderately well	Neither well nor poorly	Moderately poorly	Very poorly	I don't know
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Public access to justice in my Member State	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Public access to justice at the EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The right to bring a case before a court, or to ask for a judicial review in my Member State, functions...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other related elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If you refer to other related elements, please specify which

300 character(s) maximum

If you think that other areas of public access to justice need to be addressed or improved with regard to agro-industrial plants, please specify which

300 character(s) maximum

19. In order to reach the objectives listed in the table below, what would be the necessary level of contribution from operators of large (agro)industrial plants? :

	Very high	High	Moderate	Low	Very low	I don't know
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a Circular Economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If "other", please specify which

300 character(s) maximum

The rating is from the perspective of the power sector but this will vary according to the sector in the scope of the IED.

20. 'In order to achieve the objectives listed in the table below, what would be the degree of effort

needed from Member States' responsible competent authorities for large (agro)industrial plants? :

	Ver y high	Hi gh	Mod erat e	Lo w	Ver y low	I don't kno w
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing coherence with other EU environmental legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence with other EU safety-related legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying provisions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If "other", please specify which

300 character(s) maximum

21. Could the following objectives be achieved by EU Member States alone without intervention at EU level? (i.e. greater use of subsidiarity)

	Stron gly agre e	Moder ately agree	Neither agree nor disagree	Moder ately disagr ee	Stron gly disagr ee	I don't kno w
Progress towards a zero-pollution ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Contribute to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU industry's competitiveness, resilience and transition to becoming climate-neutral, through modernisation and decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



Support new technologies and innovation that will facilitate industry's shift to a climate neutral and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced coherence and synergies with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Simplify provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If "other", please specify which

300 character(s) maximum

22. When reviewing policy options in the IED and E-PRTR, how would you assess the following, in relative importance?

	Very important	Relatively important	Neutral	Relatively unimportant	Not important	I don't know
Options that contribute to a zero-pollution ambition for a toxic-free environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support EU industry's transition to becoming climate-neutral through decarbonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that realise EU industry's potential contribution to a circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support new technologies and innovation, that will support competitiveness and resilience and facilitate industry's shift to a climate-neutral, clean and circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that support public access to environmental information relating to the impacts of industrial emissions; and also	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options to ensure a level playing field for companies and consistent regulatory implementation across EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options that empower public participation in environmental decision making and access to justice.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Options that keep the administrative burden on business, and on government administrations, at a low level, but without compromising the effectiveness and efficiency of the EU in meeting its objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

23. In your opinion, when reviewing options for the revision of the IED, what are the main future potential impacts on large (agro)industrial plants that will need to be assessed (max. 500 characters, please) ? :

500 character(s) maximum

24. Following COVID-19, how do you assess the following statements?

	Strongly agree	Moderately agree	Neither agree nor disagree	Moderately disagree	Strongly disagree	I don't know
Revisions to the IED should very strongly contribute to the acceleration of the transition towards a green and digital economic recovery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding earmarked for the "Green Deal" and for the EU's transition to a zero-pollution economy by 2050 should not be diverted to continue the "business as usual" trend regarding agro-industrial plants as part of the EU's response to COVID-19	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify which

300 character(s) maximum

25. Whilst maintaining the effectiveness of the IED/EPRTTR legislation, would you see any possibilities to reduce costs? :

500 character(s) maximum

26. What is your view on the capacity of the IED and EPRTR to ensure a level playing field and fair competition?

500 character(s) maximum

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## Any other comments

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Please include any further information that would be useful for the ongoing impact assessments of the Industrial Emissions Directive (IED) or E-PRTR Regulation. In particular, please provide public references to relevant studies, position papers, and case studies or alternatively, please upload relevant documents. If you have already uploaded such a document as part of consultation activities undertaken for the reviews of the IED or the E-PRTR Regulation, please do NOT upload the same document again here.

**Eurelectric\_IED-OPC\_key\_messages.pdf**

If you are familiar with the IED and its implementation, or the E-PRTR, please indicate if you are happy to be contacted to participate in targeted consultation activities.

- YES, please include me / my organisation in the targeted consultation activities on revision of the IED
- YES, please include me / my organisation in the targeted consultation activities on revision of the E-PRTR
- 

In particular, if you have any further information that you believe would be useful for this impact assessment, please respond to the subsequent Targeted Stakeholder Survey that will also be conducted for this study. The targeted survey offers the opportunity to provide public references/documents for relevant studies.

**On behalf of the DG Environment IED Team, thank you very much for your contribution to this Consultation!**

If you have any questions, please contact the European Commission at this dedicated email address:

**[ENV-IED-REVISION@ec.europa.eu](mailto:ENV-IED-REVISION@ec.europa.eu)**

### Contact

ENV-IED-REVISION@ec.europa.eu

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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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