

# BOND BETER LEEF YOOR DE MILIEU

### **General review**

- We welcome the many improvements
- But, proposal fails to create a convincing framework and action for wider Zero Pollution Ambition & climate neutrality
  - Scope redesign
  - Article 9.1
  - Emission limit value
  - Transformation plans

### => Integrated approach

### • E-PRTR:

- mandatory reporting of consumption data is positive
- we need more pollutants of concern



# The scope of the IED

- Extension of scope is positive (mining, batteries...) => full value chains are addressed
- Cattle farms (annex II) in "light regime", bad operating rules (Chapter VI BIS) ⇒ unacceptable

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ONDERZOEK STIKSTOFGATE

REVER

#### De cijfers rammelen: waarom stikstof een veel groter milieuprobleem is dan gevreesd

Al jaren zetten veehouders in op emissiearme stallen en beloven ze spectaculaire ammoniakreducties. Toch gaat de uitstoot van de landbouw al tien jaar niet naar beneden. Onderzoek van De Standaard toont aan dat zes van de tien grootste vervuilers meer ammoniak uitstoten dan toegelaten, en dat de stikstofboekhouding van de overheid een knoeiboel is.

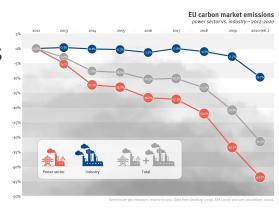
Door Ine Renson Foto's Christophe De Muvnck





### Lack of climate ambitions

- IED is not fit for climate ambitions
- Need to get rid of the Art 9.1 limitation
  - Only in 2028: report about synergies between ETS and IED
  - IED needs to be in line with Green Deal and Paris agreement
  - ETS got unsatisfied results (free allocations)
  - What's plan B?
- Refusal of licence must also be possible if climate neutrality is/will not achieved





## **Emission limit values (BAT-AEL)**

- Positive: working towards lower value of the range
- Apply the <u>general binding rules</u>
- But the danger creeps in:
  - insufficient guarantees (article 15.4)
  - Many installations can do better! (85% of EU installations have the upper value of the range in place
  - will there be impact?
- Also important: motivations, derogations, requests and assessments need to be publicly available



# **Transformation plans (Art. 27)**

- Finally! But very late timing. Our proposal: in vigor before 2030
- Auditing by Environmental Management
  System auditors = bad
  - too less expertise
  - can't be a regular checklist: no administrative approval, but an analysis based on climate targets
- => TP's need embedding in environmental permit
  - Integrated approach & value chain BAT
    - Create incentives via minimal binding levels for example for energy efficiency, electrification...

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REVES

TRANSITIEPLANNEN

TotalEnergies blijft in Antwerpen doorgaan op het fossiele pad

Uit een vergunningsaanvraag blijkt dat TotalEnergies in Antwerpen weigert te vervellen tot een energieleverancier van de toekomst. Daarmee hypothekeert het bedrijf volgens experts zijn voortbestaan in ons land.

Ine Renson Donderdag 25 november 2021 om 3.3



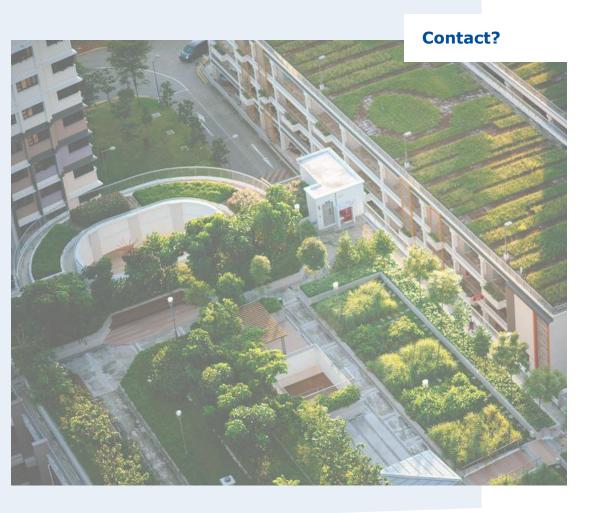
De site van TotalEnergies in Antwerpen. 'Olieraffinage is een eindig verhaal', se



## **E-PRTR (Emissions Portal)**

- Important improvements for the industrial emissions portal we can support
- Tool = must compare ELVs and other permit conditions
- Extension of list of pollutants (article 14.2 must be directly to annex II)
- Industrial emission portal is not user-friendly
- Clarify "contextual information" (Art. 3)
- Let's turn data to be more useful for benchmarking and compliance promotion.





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