

Ms Aneta Willems
Head of Unit Industrial Emissions & Safety
DG Environment
Avenue de Beaulieu 5
1160 Auderghem
Brussels, Belgium

4 December 2018

Re: comments on the Roadmap for the Industrial Emissions Directive

Dear Ms Willems,

The Industrial Emissions Directive (IED) is one of the key pieces of environmental legislation that regulates industrial activities. It enables a collaborative process for the preparation of BREFs, where all relevant stakeholders can intervene. It is therefore a priority for the business community to engage in a constructive dialogue with policy makers to ensure its successful implementation and review.

In response to the call for feedback on the roadmap, BusinessEurope would like to comment on the proposed starting time of the evaluation process.

It is questionable whether an evaluation process on such an important legislative piece should start while several BREFs have still not been adopted, and the process for implementation after their adoption can take up to four years. The evaluation would then be based on a very partial part of the impacted industries.

The conclusions from the implementation report in 2017 prepared by the European Commission, stated at the time that it was too early to see the practical results of the IED change. This report identified 2020 as an appropriate time to consider the launch of a full evaluation of this directive, given that most of the processes for the BAT will then be finalised, and Member States will then have already submitted their reports.

We are particularly wary of the investment uncertainty it may cause, at a time when only a small fraction of the permits for IED installations have been updated, and when not even half of the 50.000 permits would be updated by 2021. Furthermore, the robust data set related to measurable improvement would not be available before 2023. Two review processes (i.e. evaluation of the directive and update of permits) would then go in parallel, amplifying the regulatory uncertainty.

Against this, we would recommend reconsidering the starting time of the evaluation process. This would guarantee a stronger coverage of the impacted industries for the evaluation and would also leave legislation enough time to show its real impact.

We hope you will be able to take these views in due consideration. BusinessEurope remains at your disposal to discuss further on the subject.

Yours sincerely,



Alexandre Affre

Director Industrial Affairs