



EUROPEAN ALUMINIUM NOTE

BREF WORKSHOP ON THE IED SEVILLA PROCESS

14-15 MARCH, DESSAU-ROßLAU

Brussels, March 2024

Introduction

European Aluminium is pleased to present this note on the upcoming 14-15th March 2024 BREF workshop in German Environment Agency, in Dessau-Roßlau, focusing on the BREF-Sevilla Process. On behalf of the aluminium value chain we see that it is imperative to address key considerations that shape the effectiveness and inclusivity of regulatory decision-making. The timing of this workshop is most appropriate as yesterday March 12th 2024¹ featured the European Parliament Plenary vote regarding the IED 2.0 agreed text with EU Member States on the revision of the Industrial Emissions Directive (IED, Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), that resulted in the IED-trilogue text being approved with 393 votes in favor, 173 against, and 49 abstentions.

Pilot Testing of New Abatement Techniques

The proposal to pilot-test new abatement techniques in industrial plants with EU funding support before establishing them as Best Available Techniques (BAT) is advised. This approach ensures that emerging technologies undergo rigorous testing in real-world industrial settings, thereby validating their efficacy and feasibility. By conducting pilot tests, potential risks and benefits can be evaluated, allowing for informed decisions regarding the adoption of new abatement techniques. Additionally, this process promotes innovation and facilitates the transition towards more sustainable industrial practices.

Access of Technology Providers to BREF Processes

The exclusion of technology providers from direct access to BREF processes stems from concerns over safeguarding industry data integrity. It's essential to prevent potential conflicts of interest and uphold the confidentiality of confidential business information (CBI). While technology providers can offer valuable insights, solutions proposed must undergo thorough scrutiny and cost-effectiveness analysis beyond theoretical feasibility.

¹ *Reducing pollution from industry and large livestock farms (12/03/2024)*. European Parliament. Reference: <https://www.europarl.europa.eu>

March 2024

Involvement of Concerned Industry and Data Collection

Any modifications to the Sevilla process, particularly through updates to the BREF-Guidance 2012/119/EU, must prioritize the full involvement of concerned industry stakeholders. This inclusive approach ensures that regulatory decisions are informed by practical insights and industry expertise. Additionally, sufficient time for representative data collection is essential to ensure the robustness and accuracy of regulatory determinations. By actively engaging industry stakeholders in the data collection process, we can enhance the reliability and relevance of regulatory assessments, ultimately leading to more effective environmental management strategies.

Conclusion

In conclusion, this 14-15th March 2024 BREF workshop on the IED Sevilla Process presents opportunities to start a discussion on the BREF guidance document between EU Institutions, industry and other interested stakeholders. Embracing innovative approaches such as pilot testing of new abatement techniques and ensuring inclusive access for technology providers can enhance the efficacy and relevance of regulatory frameworks. Furthermore, prioritizing the involvement of concerned industry stakeholders and robust data collection mechanisms is essential to inform regulatory decisions accurately and comprehensively. By working collaboratively and transparently, we can address challenges more effectively and pave the way for a future in which European industry is at the forefront of environmental protection.

