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HOW CAN CHEMICAL MANAGEMENT BE IMPROVED IN BREFS?

HOW SHOULD THE GOAL OF THE EUROPEAN GREEN DEAL BE CONSIDERED IN BREFS?

IDENTIFICATION OF HAZARDOUS SUBSTANCES RELEVANT IN DIFFERENT INDUSTRIAL SECTORS

How / Where to identify these substances?

- List of polluting substances in Annex II IED
- uPOPs in Annex C of Stockholm Convention; POP regulation; BAT/BEP guidances
- Hazardous substances already reported in emission inventories
- Priority substances in Water Framework Directive
- Substances from baseline reports already elaborated
- Minamata Convention
- Substances restricted under REACH
- Sector studies on KEI (key environmental issues): TXT, CER, SA, SF

GENERAL CONSIDERATIONS (1)

- BREF process = frontloading process
- Detailed knowledge about chemicals used and pollutants emitted already necessary for initial positions. This needs time and resources in TWG.
- It is dangerous to exclude relevant parameters from the scope of the BREF at the time of the Kick-off Meeting and before the data sampling with questionnaires starts.
- Better solution: ask for parameters in questionnaire (drop down modus). If no information is available, then it can be excluded.

GENERAL CONSIDERATIONS (2)

- For relevant hazardous substances BAT-AELs should be elaborated. These BAT-AELs should lead to an emission reduction and improved environmental protection.
- A good cooperation and information exchange between chemical inspection under REACH and environmental inspection and permitting under IED is necessary.
- Different systems/regulations already handle hazardous substances (WFD, POP-Regulation, REACH, emission inventories,...). Information from these systems have to be linked to capture all relevant parameters per sector.
- Green Deal: zero pollution ambition for a toxic free environment

This supports BAT-AELs for relevant hazardous chemicals in the BREF and it also supports ambitious BAT-AEL ranges.

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