



Workshop on Implementation of BAT Conclusions for Waste Incineration

The puzzle of future
environmental permits

Lighea Speciale



How to apply WI BAT Conclusions – a practical case

DAY 2

Why day 2?

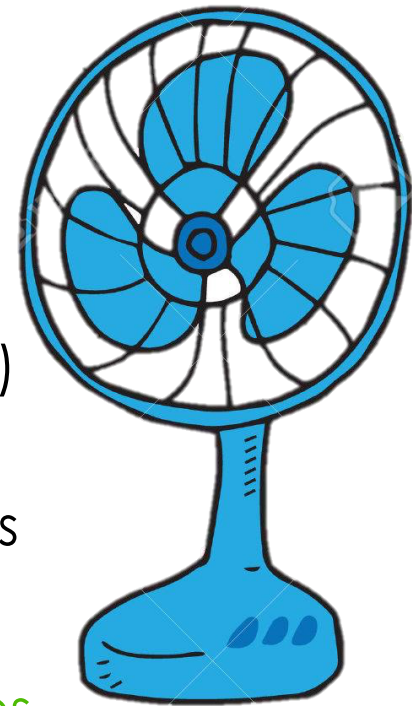
Implementation process: when theory meets reality

WI BAT Conclusions are not user-friendly:

A number of information are not given in the WI BAT conclusions because they are included

- in other pieces of legislation (no direct reference)
- in other sections of WI BREF (no direct reference)
- Or left as implementation issue for Member States

Simulation of negotiations with competent authorities



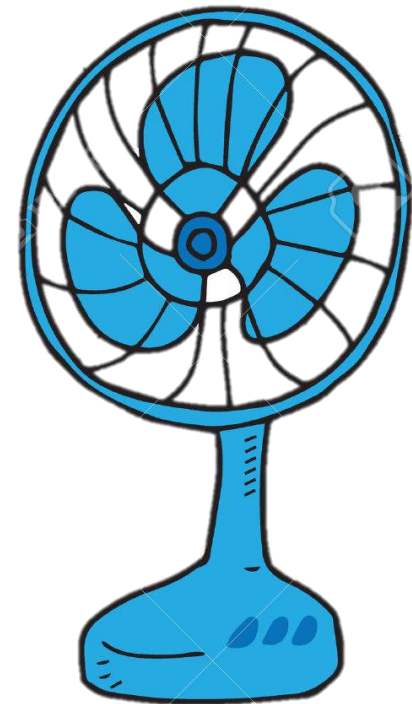


Why day 2?

The European Commission started a project in 2018 to provide support for Member States on IED and BAT implementation.

June 2019 – February 2020 will be the pick period for the development of this project. This period overlaps with the beginning of the implementation process for WI BAT Conclusions.

CEWEP will also be involved in the discussions at EU level and will be asked to send feedback.





Why day 2?

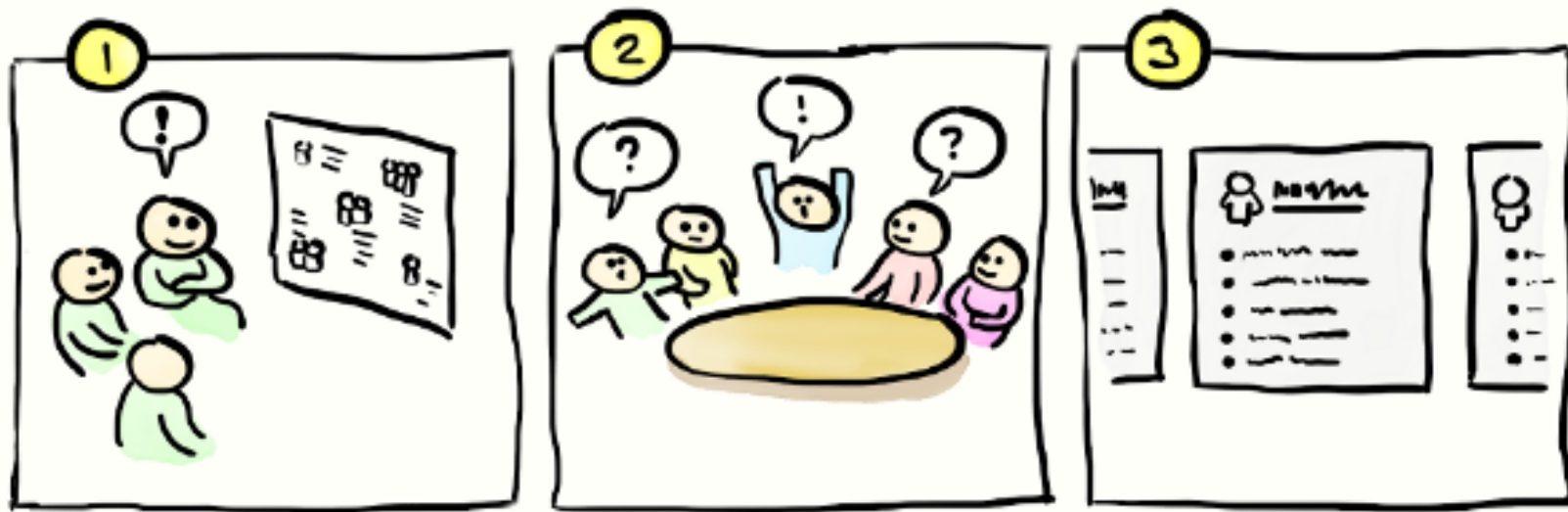
CEWEP secretariat has extensive experience with the content and the meaning of WI BAT Conclusions

CEWEP members have extensive experience with daily life of WI plants and local legislation



Now is the time to share!

Why day 2?

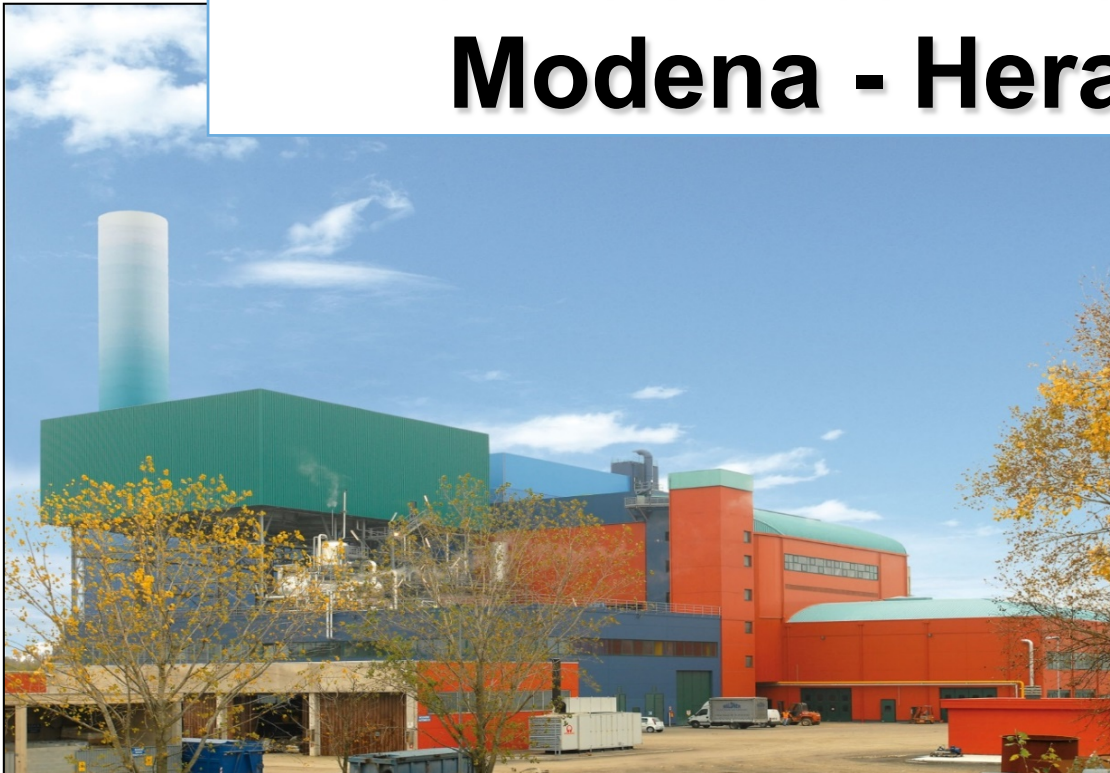


- Ask question
- Share experience
- Propose changes/suggestions
- Express opinions
- www.sli.do using the hashtag *BREF*



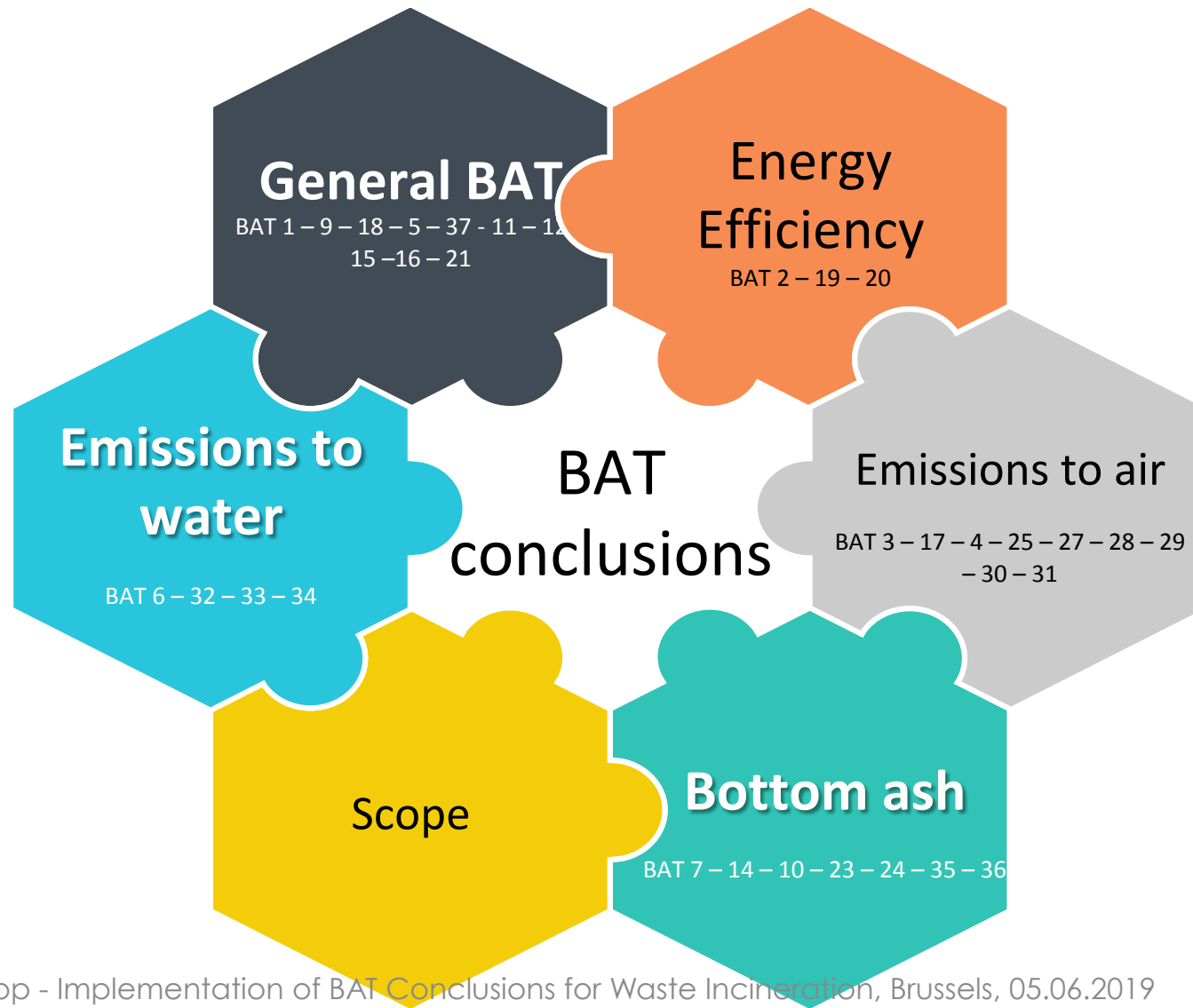
Programme of the day

The Waste-to-Energy plant of Modena - Herambiente





Programme of the day





What to keep in mind

- Legal framework is complex
- Many aspects are left for implementation because Member States want freedom to decide
- Your competent authority can always be stricter
- WI BAT Conclusions will become basis for new permits, but IED provisions still stand
- WI BAT Conclusion overwrite the mirroring provisions in IED Annex VI
- European standards have been developed from the IED and not from BAT Conclusions



What to keep at hand

- Summary of Acronyms
- Draft WI BAT Conclusions
- Your old permit
- Irony
- ...Paracetamol?



Disclaimers

*“The list of techniques described in the BAT conclusions is neither prescriptive, nor exhaustive. Other techniques may be used that ensure **at least an equivalent level of environmental protection.**”*

Commission Implementing Decision 2012/119/EU

“BAT conclusions should be the reference for setting permit conditions. They can be supplemented by other sources.”

Also for BATAELs, according to IED article 15.3 (b), « it is possible to set different emission limit values than those referred to under point (a) in terms of values, periods of time and reference conditions »



Time to work!
Questions... already?