

EU–ASE Feedback to the Public Consultation on the Revision of the Industrial Emissions Directive



E3G



EUROPEAN ALLIANCE TO
SAVE ENERGY

Creating an Energy-Efficient Europe



EUROPEAN ALLIANCE TO
SAVE ENERGY
Creating an Energy-Efficient Europe

Comments to the Public Consultation on the Revision of the Industrial Emissions Directive

The European Alliance to Save Energy (EU-ASE) welcomes the Commission's proposal to revise the Industrial Emissions Directive and supports the high level of ambition in tackling emissions from large industrial installations as well as the stronger emphasis on energy and resources efficiency, including water.

Energy and resource efficiency in the industrial sector will considerably help tackle the climate change and resource scarcity while boosting resilience, competitiveness, and innovation. The proposal is a very good step forward, however improvements could be made across the provisions. In particular on the consumption and reuse of resources, such as energy, water, and raw materials where the directive should promote a stronger application of the circular economy and energy efficiency first principles.

The industrial sector represents a considerable share of both energy and water use in the world. In the EU, industry represents 25% of the final end-use of energy (Eurostat). In some European countries, industry even accounts for up to 80% of the total water abstractions (FAO Aquastat). Such substantial energy and water consumptions make the case for increasing energy and water efficiency requirements in industry.

The scope of the IED should look beyond reducing emissions into air, water and land and promote the more efficient use of resources, with the right incentives. Industrial installations should start monitoring and improving their use of water, energy, and material input as, greater efficiency in one resource also increase efficiency in the other. For instance, more water efficiency in industrial heat processes, saves energy and reduces emissions. This would directly contribute to reducing the output from installations such as wastewater discharge, CO₂ emissions, and waste generation, and contribute to better protect the environment and fulfill the European Green Deal objectives.

Under Art. 3, the legal definition of "installation" should not only consider their potential impact on emissions and pollution but also on consumption of resources to reduce its environmental impact and increase its operating efficiency. In addition, the new definitions introduced under Art. 3, including BAT-AEPLs and benchmarks, are confusing and might lead to unnecessary uncertainty.

Furthermore, we believe that permits granted by public authorities, the Environmental Management System, and the Transformation Plan prepared by the operator for 2030-2050 are very powerful tools to incentivize industry to design and operate installations aiming to minimize their environmental impact. Requirements concerning the level of consumption of water, energy, and raw materials should be explicitly integrated in these documents. In order to enhance transparency with EU citizens and accountability of industrial facilities, we also believe these documents should be publicly available online.



EUROPEAN ALLIANCE TO
SAVE ENERGY
Creating an Energy-Efficient Europe

In the same vein, the creation of an Innovation Centre for Industrial Transformation (INCITE) that collects information on innovative techniques and encourages companies to test new techniques with improved environmental performance is a good initiative. We also welcome the introduction of mandatory transformation plans showcasing the operator's ability to operate under clean, circular and climate-neutral principles.

Finally, the role of digital technologies should be strengthened and the Directive should recognize their potential in improving operational efficiency and monitoring emissions. The inclusion of digital techniques as part of the revision of the best available techniques reference documents (BREFs) would improve water and energy efficiency. In this respect, the IED should recognize that certain digital techniques allow for swifter revision of BAT documents.

Finally, provisions related to energy efficiency and reusing water must be developed in conjunction with the revision on the Energy Efficiency and the Urban Waste Water Treatment Directives.