



# Some considerations on implementing the IED

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# A fair implementation IED

- Enhance level playing field
- Improve quality competent authorities
- Discuss influence other EU policies
- Improve BREF (-making process)
- Accept national alternatives

# Enhance level playing field

- Minimum requirements, based on BAT conclusions
- Derogation really an exception
- Harmonisation of monitoring, compliance, environmental inspections

# Improve quality competent authorities

- (Dutch) industries needs skilful CA
- Take care for knowledge en experiences
- Create enough critical mass permitting services

# Discuss influence other EU policies on permitting

- NEC
- Directive air quality
- Natura 2000

## Improve BREF (-making process)

- Quality of different BREF's needs to be comparable
- Smaller BAT's ranges
- Focus on essential elements
- Less pages...

# Accept national alternatives

- In some cases its cost effective to use alternatives for BAT
- NOx ETS in the Netherlands
- No EU wide NOx ETS

End of presentation