



# Interpretation, application and review of IPPC

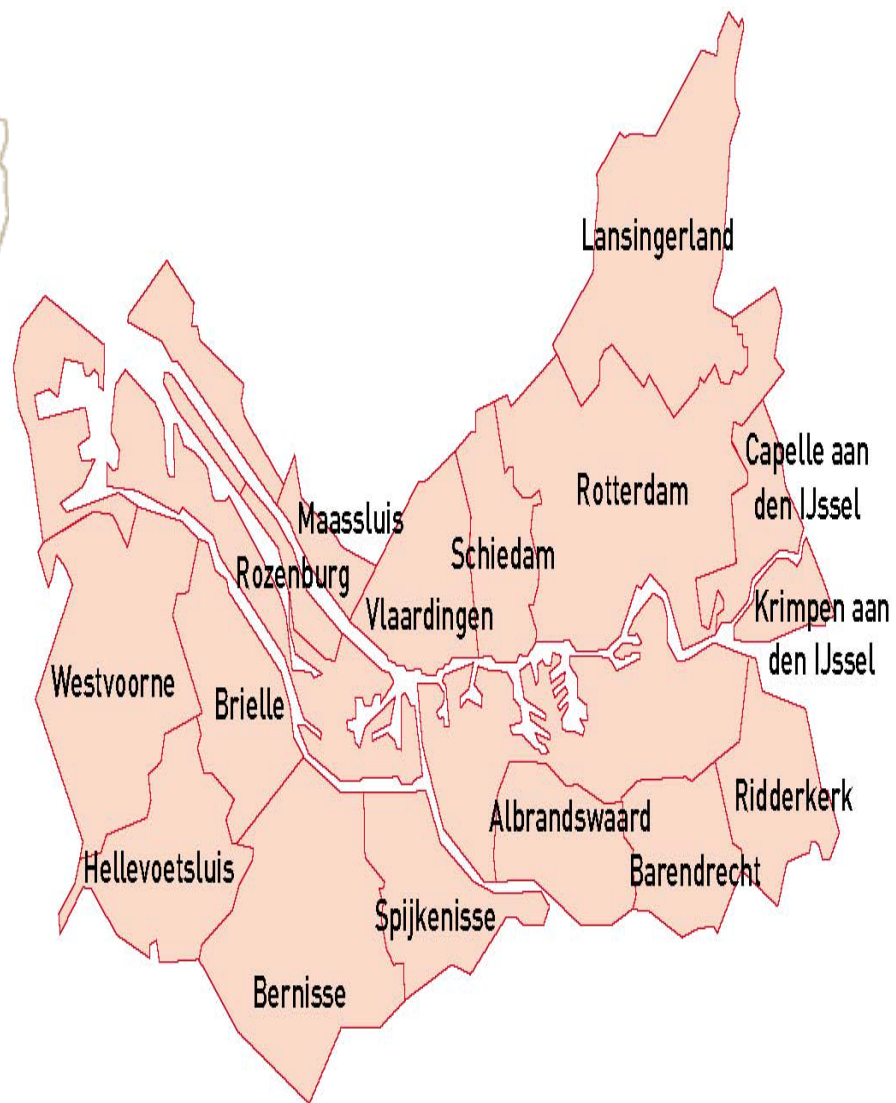
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## DCMR Environmental Protection Agency

- Is a joint environmental agency of the Province of Zuid-Holland, the city of Rotterdam and 15 municipalities in the Rijnmond area
- Addresses issues spanning environmental, spatial planning and economic concerns
- Monitors and safeguards the region's environmental quality for 1.2 million residents
- Was established in 1973

# Area of Operations



# Tasks

1. Issuing and enforcing permits
2. Monitoring & developing knowledge
3. Advising
4. Responding to incidents and managing crises

# IPPC-proof?



## Interpretation IPPC (BAT)

- Integrated permit already common sense in Holland
- We used to work with ALARA (As low as reasonably achievable)
- ALARA was incorporated in our Dutch Guideline on emissions
- ALARA= BAT?
- Discussions about costs, local circumstances and technical characteristics

## Interpretation IPPC (BAT)

- In Environmental Management Act at least BAT
- Supreme court strict interpretation BAT
- No cost-effective analysis possible
- BAT-AEL of the BREF is ELV
- Age of BREF also in consideration to determine BAT

## Recommendations

- Working with BREF's complex
- Too much information?
- Possibility to make it simpler?
- Only relevant information BAT?
- Other information as background



## Recommendations

- BREF process takes a long time
- How to keep the Industry involved?
- More pressure to keep them involved?
- High quality of the BREF's

# Revision IPPC



## Goal Revision IPPC (IED)

- To deliver further protection of air, water and soil
- limiting potential abuses
- Ensure fair play
- Level playing field
- Improving innovation
- Reduce administrative costs

## Revision IPPC (IED)

- Improvements have been made
- In order to fix weak and unclear provisions in IPPC
- Promote BAT because of abuse and undermine the IPPC
- Derogations have been strengthened

## Concerns

- Some member states want maximum flexibility
- This means derogations allowing high emissions
- Refusing clearer and stricter criteria by legally binding rules

## Concerns

- Very weak minimum rules for the oldest large combustion plants
- Very weak minimum rules for large combustion plants that operate less hours than normal
- These installations are responsible for about 90% of industrial nitrogen oxide and sulphur dioxide emissions

# Recommendations

- Derogation only possible in exceptional cases
- Limited to existing plants
- Not subject to a secondary cost-benefit assessment
- Based on proper criteria
- Publicly justified
- Innovation instead of derogation