

Evaluation of the Industrial Emissions Directive & Targeted Stakeholder Survey

Eurelectric response

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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September 2019

KEY MESSAGES

Emissions from the power sector

The power sector has, over the last decades, undertaken drastic efforts to reduce its non-CO₂ emissions and significantly limit its air pollution. For instance, between 2005 and 2017, emissions of SO₂ and NO_x by the electricity industry fell by 82% and 53% respectively, while direct emissions of PM_{2.5} were reduced by 58% (source: EEA). These impressive reductions took place while electricity generation remained stable over the same period. Over the next decade, recently agreed source-specific European legislation for the energy sector (namely the ongoing implementation of the Best Available Techniques Reference Documents for Large Combustion Plants (BREF LCP) and Waste Incineration (WI) and the Medium Combustion Plant (MCP) Directive) will lead to further significant emission reductions. Our sector intends to pursue and even accelerate this contribution to improving air quality across Europe: the power sector is committed to accelerate the clean energy transition and to achieve carbon-neutral electricity mix in the EU well before mid-century. Therefore, additional emission reductions are expected in the next 15 years and beyond, driven by the implementation of the climate and energy policy, the continued desire to invest in carbon-free generation by European utilities and the industrial emissions/air quality framework. Besides, the power sector activities also fall under the scope of other pieces of legislation regarding e.g. its emissions to water or its by-products, residues and wastes and these legislation will also allow for a reduction in the impact of LCP on the environment and health.

Coherence between policies and better implementation

Eurelectric fully understands the need for and supports an ambitious industrial emissions policy in Europe. We support coherence with the EU's 2030 energy and climate policy and its implementation timeline to achieve better environment and human health in a cost-effective approach.

We would like to highlight that the Commission Implementing Decision (EU) 2017/1442 of 31 July 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for large combustion plants was published in August 2017 and that Member States have four years (i.e. 2021) to review and if necessary update permits for LCPs. The current BREF for LCPs and the aforementioned Implementing Decision cover the granting and renewal of permits for large biomass installations, district heat plants and over 90% of EU fossil fuel electricity capacity. At this stage, it is therefore premature to assess the full impact of the implementation of the LCP BREF, as a key piece of the IED framework for LCPs.

The Seville process

The IED is a crucial piece of legislation for the industrial sector, including the power sector. The successful characteristics of the IED can be attributed to key guiding principles adopted under IPPC and that remain fully relevant: an integrated approach that takes into consideration cross-media effects as well as the cost-effectiveness of the measures; technically and economically achievable BAT-AELs that ensure a level playing field across the EU; and special consideration in the permit setting of the geographical location, the local environmental conditions and the technical characteristics of the installation concerned.

Under the IPPC system, the Seville process led to the adoption of mere BREFs guidance documents that were a reference for permit setting across the EU. Under the IED, the process now leads to the adoption of a Commission implementing decision where BAT conclusions, and in particular BAT-AELs, are the legal reference for permit setting, the cornerstone of the new IED system.

The IED considerably strengthened the Sevilla process and Eurelectric would like to draw on its experience in particular with the review process of the LCP BREF to make the following observations about the implementation of these IED provisions:

- The process was very lengthy (2010-2017) and led to the collection of a considerable amount of data. The process would have benefited from a more targeted approach (focus on key emissions in accordance to their environmental impact set at the beginning of the process), based on sufficiently robust and representative data.
- The scope of the Seville process cannot be extended either without environmental justification (e.g. monitoring requirements with no evidence of environmental impact that transfer the costs to operators; possible upcoming environmental issue) or where other EU environmental legislations already exist (climate, energy, water, etc).
- The BREF drafting/reviewing process must be fully consistent with the IED in order to ensure that the final BAT conclusions adopted in a Commission implementing decision are not inconsistent with the rules of the IED which should take precedence (e.g. different averaging periods in the IED Annex V and the BAT conclusions for LCPs).
- There should be a clear and transparent methodology to derive BAT-AELs based on the data collected for the sector and each technique (and not necessarily a statistical approach): this would ensure a clear upfront harmonised approach and transparency for all stakeholders.
- Given the legally binding nature of the BAT conclusions, BAT-AELs should not be set below measurement uncertainty or manufacturer guarantee.
- Cross-media and applicability restrictions should be taken into account.
- Significant progress must be made about the economic and financial impact of the BREF/BAT conclusions e.g. through an impact assessment of the draft Commission implementing decision and preferably earlier in the process.

Eurelectric believes that the respect of the full BREF guidance document (Commission Implementing Decision 2012/119/EU) during the Seville process would significantly improve the process and alleviate many of the concerns listed above.

Article 13 Forum

Article 13 IED required the Commission to establish and regularly convene a forum composed of representatives of Member States, the industries concerned, and non-governmental organisations in order to promote environmental protection. Eurelectric would like to stress the importance of a broad representation of industry in order to provide expertise on the number of sectoral and horizontal BREFs, and on the overall implementation of the Industrial Emissions Directive. Industry expertise is crucial in the BREF process both in the Technical Working Groups and the article 13 Forum.

Evaluation of the Industrial Emissions Directive

Fields marked with * are mandatory.

Introduction

The Industrial Emissions Directive 2010/75/EU (IED) is the primary instrument in place at the EU level to control and mitigate the environmental and human health impacts arising from industrial emissions in the EU. The IED regulates around 50 000 of the largest industrial installations covering a wide range of agro-industrial sectors. These include: power plants, refineries, and production of steel, non-ferrous metals, cement, lime, glass, chemicals, pulp and paper, food and drink as well as waste treatment and incineration and the intensive rearing of pigs and poultry. The general objective of the IED is to prevent, reduce and eliminate as far as possible emissions into air, water and land arising from industrial activities.

The IED aims to ensure that industrial emissions are dealt with in an integrated way and minimised. Permits must be issued for these installations by national authorities with conditions based on the use of Best Available Techniques (BAT). To ensure a comparable EU approach, sectoral BAT Reference Documents (BREFs) are produced through an EU level techno-economic assessment carried out by a Technical Working Group of the Commission, Member States, industry and civil society. The BAT Conclusions are adopted as Commission implementing acts.

The IED is now undergoing an evaluation against the following five key evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value, and this public consultation is part of this evaluation process. Your responses provided to this questionnaire will be analysed and will feed into the overall IED evaluation process.

The roadmap of the evaluation process can be found [here](#).

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish

- ☐ French
- ☐ Gaelic
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Helene

* Surname

LAVRAY

* Email (this won't be published)

hlavray@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

4271427696-87

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Pierre and Miquelon |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Vincent and the Grenadines |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Samoa |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ San Marino |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ São Tomé and Príncipe |
| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ Saudi Arabia |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Senegal |
| ☐ Anguilla | ☐ Eritrea | ☐ Malaysia | ☐ Serbia |
| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Seychelles |
| ☐ Antigua and Barbuda | ☐ Ethiopia | ☐ Mali | ☐ Sierra Leone |
| ☐ Argentina | ☐ Falkland Islands | ☐ Malta | ☐ Singapore |
| ☐ Armenia | ☐ Faroe Islands | ☐ Marshall Islands | ☐ Sint Maarten |
| ☐ Aruba | ☐ Fiji | ☐ Martinique | ☐ Slovakia |
| ☐ Australia | ☐ Finland | ☐ Mauritania | ☐ Slovenia |
| ☐ Austria | ☐ North Macedonia | ☐ Mauritius | ☐ Solomon Islands |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Somalia |
| ☐ Bahamas | ☐ French Guiana | ☐ Mexico | ☐ South Africa |
| ☐ Bahrain | ☐ French Polynesia | ☐ Micronesia | ☐ South Georgia and the South Sandwich Islands |
| ☐ Bangladesh | ☐ French Southern and Antarctic Lands | ☐ Moldova | ☐ South Korea |
| ☐ Barbados | ☐ Gabon | ☐ Monaco | ☐ South Sudan |

☐ Belarus	☐ Georgia	☐ Mongolia	☐ Spain
☒ Belgium	☐ Germany	☐ Montenegro	☐ Sri Lanka
☐ Belize	☐ Ghana	☐ Montserrat	☐ Sudan
☐ Benin	☐ Gibraltar	☐ Morocco	☐ Suriname
☐ Bermuda	☐ Greece	☐ Mozambique	☐ Svalbard and Jan Mayen
☐ Bhutan	☐ Greenland	☐ Myanmar /Burma	☐ Swaziland
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden
☐ Bonaire Saint Eustatius and Saba	☐ Guadeloupe	☐ Nauru	☐ Switzerland
☐ Bosnia and Herzegovina	☐ Guam	☐ Nepal	☐ Syria
☐ Botswana	☐ Guatemala	☐ Netherlands	☐ Taiwan
☐ Bouvet Island	☐ Guernsey	☐ New Caledonia	☐ Tajikistan
☐ Brazil	☐ Guinea	☐ New Zealand	☐ Tanzania
☐ British Indian Ocean Territory	☐ Guinea-Bissau	☐ Nicaragua	☐ Thailand
☐ British Virgin Islands	☐ Guyana	☐ Niger	☐ The Gambia
☐ Brunei	☐ Haiti	☐ Nigeria	☐ Timor-Leste
☐ Bulgaria	☐ Heard Island and McDonald Islands	☐ Niue	☐ Togo
☐ Burkina Faso	☐ Honduras	☐ Norfolk Island	☐ Tokelau
☐ Burundi	☐ Hong Kong	☐ North Korea	☐ Tonga
☐ Cambodia	☐ Hungary	☐ Northern Mariana Islands	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ Norway	☐ Tunisia
☐ Canada	☐ India	☐ Oman	☐ Turkey
☐ Cape Verde	☐ Indonesia	☐ Pakistan	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Palau	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palestine	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Panama	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Papua New Guinea	☐ Ukraine
☐ China	☐ Israel	☐ Paraguay	☐ United Arab Emirates
☐ Christmas Island	☐ Italy	☐ Peru	☐ United Kingdom
☐ Clipperton	☐ Jamaica	☐ Philippines	☐ United States
☐ Cocos (Keeling) Islands	☐ Japan	☐ Pitcairn Islands	☐ United States Minor Outlying Islands
☐ Colombia	☐ Jersey	☐ Poland	☐ Uruguay

- | | | | |
|--|----------------------------------|---|---|
| ☐ Comoros | ☐ Jordan | ☐ Portugal | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Puerto Rico | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Qatar | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Réunion | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Romania | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Russia | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Rwanda | ☐ Wallis and Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Saint Barthélemy | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Helena Ascension and Tristan da Cunha | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Kitts and Nevis | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Lucia | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Martin | |

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

☒ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☒ I agree with the [personal data protection provisions](#)

General awareness of industrial emissions and the measures to tackle them

This section seeks to gather information on the general level of knowledge of emissions from large industrial installations, their evolution over time, and the measures in place to address them. It does not require an in-depth knowledge of the Industrial Emissions Directive.

Please select the answer which best represents your views.

1. To what extent do large industrial installations operate in your places of interest (place where you live, work or study)?

- ☒ No industrial activity (skip questions 2 to 5)
- ☐ Low industrial activity
- ☐ Some industrial activity
- ☐ High industrial activity
- ☐ Very high industrial activity
- ☐ Do not know

6. Do you have access to sufficient information on the level of environmental impacts of large industrial installations?

- ☐ No information at all
- ☐ Limited information
- ☐ Some information
- ☐ Sufficient information
- ☒ Very detailed information
- ☐ Do not know

7. In your opinion, has the level of environmental impacts from large industrial installations in the last 5 years:

- ☒ Significantly decreased
- ☐ Decreased somewhat
- ☐ Stayed the same
- ☐ Increased somewhat
- ☐ Significantly increased
- ☐ Do not know

8. In your opinion, the availability of information on the level of emissions from large industrial installations in the last 5 years has:

- ☐ Significantly increased
- ☒ Increased somewhat
- ☐ Stayed the same
- ☐ Decreased somewhat
- ☐ Significantly decreased
- ☐ Do not know

9. To what extent are you familiar with the following?

	Extremely familiar	Very familiar	Moderately familiar	Slightly familiar	Not familiar
EU legislation concerning industrial emissions	☒	☐	☐	☐	☐
The process used to establish permit conditions by local, regional or national competent authorities	☒	☐	☐	☐	☐
The role of Best Available Techniques in permits	☒	☐	☐	☐	☐

The environmental requirements set in permits	☒	☐	☐	☐	☐
Availability of emissions information on installations (for example from the European Pollutant Release and Transfer Register (E-PRTR*) and public registers)	☒	☐	☐	☐	☐
Enforcement processes and use of penalties	☐	☒	☐	☐	☐

(*) <https://prtr.eea.europa.eu/#/home>

Specialised views on the functioning of the Industrial Emissions Directive

This section focuses on gathering more in-depth views about the functioning of the permitting system governed by the Industrial Emissions Directive and requires a certain level of corresponding knowledge. The questions are largely structured around the 5 evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added-value. Questions 10 to 20 can be skipped by the general public.

Please select the answer which best represents your views and/or indicate the extent to which you agree with the statements in the following questions.

10. To what extent do you agree that the Industrial Emissions Directive (including its secondary legislation, i.e. regulations and decisions) has contributed to the following?:

	Stongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To reducing environmental impacts arising from large industrial activities	☒	☐	☐	☐	☐	☐
To a more effective enforcement of permit conditions to control environmental impacts from large industrial installations	☐	☒	☐	☐	☐	☐
To ensure an EU level playing field for EU Members States and operators of large industrial installations	☐	☒	☐	☐	☐	☐

11. To what extent do you agree that the regular updating of BREFs and permits (choose below) under the Industrial Emissions Directive has encouraged the development and deployment of better techniques to prevent and control environmental impacts from large industrial installations?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
BREFs	☐	☒	☐	☐	☐	☐
Permits	☐	☒	☐	☐	☐	☐

12. To what extent do you agree that the process to draw up and regularly review BREFs:

	I am not familiar with /aware of the BREF process	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Is effective in identifying techniques for achieving a high level of environmental protection	☐	☒	☐	☐	☐	☐	☐
Allows both costs and benefits to be sufficiently considered in identifying the best available techniques	☐	☐	☐	☐	☒	☐	☐
Captures new developments in techniques	☐	☒	☐	☐	☐	☐	☐

13. To what extent is the cost to industrial installations of complying with permit conditions based on the use of BAT acceptable in view of the benefits?

- ☐ I am not familiar with/aware of the costs
- ☐ Extremely acceptable
- ☐ Very acceptable
- ☒ Moderately acceptable
- ☐ Slightly acceptable
- ☐ Not acceptable
- ☐ Do not know

14. To what extent are permits issued to large industrial installations based on the IED and BREFs effective in controlling the environmental impacts of those installations?

- ☒ Extremely effective
- ☐ Very effective
- ☐ Moderately effective
- ☐ Slightly effective
- ☐ Not effective
- ☐ Do not know

15. To what extent do you agree that the provisions of the IED on the following (permits, enforcement and access to information) have led to more effective control of the environmental impacts of large industrial installations?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
Permits	☒	☐	☐	☐	☐	☐
Enforcement	☒	☐	☐	☐	☐	☐
Access to information	☒	☐	☐	☐	☐	☐

16. To what extent do you agree that the IED addresses the following:

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	☒	☐	☐	☐	☐	☐
The most relevant pollutants	☒	☐	☐	☐	☐	☐
The most polluting agro-industrial sectors	☒	☐	☐	☐	☐	☐

17. To what extent do you agree that the process to draw up and regularly review BREFs addresses the following?

	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
The most relevant environmental impacts	☒	☐	☐	☐	☐	☐
The most relevant pollutants	☒	☐	☐	☐	☐	☐
The most polluting agro-industrial sectors	☒	☐	☐	☐	☐	☐

18. To what extent is the IED internally consistent (no contradictions and no overlaps) among its chapters and provisions?

- ☐ Extremely consistent
- ☒ Very consistent
- ☐ Moderately consistent
- ☐ Slightly consistent
- ☐ Not consistent
- ☐ Do not know

19. To what extent is the IED coherent with the following EU policies?

	Extremely coherent	Very coherent	Moderately coherent	Slightly coherent	Not coherent	Do not know
Climate	☐	☐	☒	☐	☐	☐
Energy	☐	☐	☒	☐	☐	☐
Air Quality	☐	☒	☐	☐	☐	☐
Water Quality	☐	☒	☐	☐	☐	☐
Circular Economy	☐	☒	☐	☐	☐	☐
Waste management	☐	☒	☐	☐	☐	☐
Sustainable use of resources	☐	☒	☐	☐	☐	☐

20. To what extent do you agree that legislation to regulate environmental impacts of large industrial installations at the EU level, as opposed to national level, helps the following?

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	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Do not know
To better protect human health and the environment	☒	☐	☐	☐	☐	☐
To ensure that competent national authorities address industrial pollution	☒	☐	☐	☐	☐	☐
To avoid competition on environmental standards	☒	☐	☐	☐	☐	☐

Any other comments

21. Please include any further information that you believe would be useful for this evaluation of the Industrial Emissions Directive.

You will find at the following link Eurelectric's key messages on the IED Fitness Check (together with our complete answers to this consultation and the targeted stakeholder survey): https://www.eurelectric.org/media/3987/ied_consultations-2019-030-0485-01-e.pdf

Contact

ENV-IED-EVALUATION@ec.europa.eu

Survey question		Type of question in survey	Your response
Respondent ID			10990117803
Name		Open-Ended Response	Helene Lavray
Name of organisation or institution		Open-Ended Response	Eurelectric
E-mail address		Open-Ended Response	hlavray@eurelectric.org
Country of residence		Response	European Union
Stakeholder type		Response	Industry
After completing this questionnaire, are you happy to be contacted for any clarifications, a follow-up interview and/or further updates on the evaluation?		Other (please specify)	
		Response	Yes
		Other (please specify)	
1.1 To what extent do you think that the IED has contributed to reducing and (as far as possible) eliminating pollution arising from agro-industrial activities:			
		Response	Strongly agree
1.2 To what extent do you think that the IED has contributed to reducing the following for agro-industrial activities:			
		Consumption of natural resources	Neither agree nor disagree
		Energy use	Agree
		Waste generation	Neither agree nor disagree
1.3 In your opinion, is the IED the appropriate instrument for controlling the following for agro-industrial activities:			
		Consumption of natural resources	No
		Energy use	No
		Waste generation	No
1.4 To what extent do you think that the IED addresses the following		The most relevant environmental impacts	Strongly agree

	The most relevant pollutants	Strongly agree
	The most polluting agro-industrial sectors	Strongly agree
		- Regular reporting from the European Environment Agency (EEA) shows that the impact of Large Combustion Plants from the power sector on health and environment is decreasing. - Natural resources is not defined (article 13 IED refers to consumption and nature of raw materials). - Cross-media effect has to be considered carefully as some BAT could lead to e.g. higher amount of waste. - The IED contains general provisions on resources, energy & waste as well as specifying that BAT should include consideration of these so although the IED should not be the primary vehicle its provisions ensure a holistic approach is taken to the “environment as a whole”. This is an appropriate approach. The LCP BREF also contains limits on energy efficiency. - However, the implementation of the whole EU regulatory framework has to be carefully considered as e.g. energy would be primarily addressed under the climate and energy policy, waste under the waste framework legislation and water under the water framework directive.
1.5 Please provide further details to justify your answers including any supporting evidence.	Open-Ended Response	
2.1 Are there any agro-industrial activities that fall outside of the scope of the IED (partially due to the thresholds in Annex I of the IED or fully) which generate high levels of pollution?	Response If yes, please indicate which ones and provide any supporting evidence.	Do not know
2.2 Are there any pollutants that have been omitted or fall outside of the scope of the IED which, in your opinion, should be captured?	Response	No

	If yes, please indicate which ones and provide any supporting evidence.
2.3 To what extent do you think that the IED contributes to the reduction of hazardous substances (persistent organic pollutants, heavy metals)?	
	Strongly agree Annex II of IED provides a comprehensive list of polluting substances under its scope and there are some rules for certain substances in the IED and BAT conclusions as relevant. There are also other pieces of EU legislation whose specific aim is to implement measures related to substances such as POPs or substances of very high concern. BREF conclusions for LCP and WI effectively address the key environmental pollutants of the respective sectors describing BAT technologies, co-benefits and applicability restrictions as well as setting specific BAT-AELs for normal operating conditions where appropriate. In both BREFs mitigation of mercury and other heavy metals as well as dioxin emissions where addressed for relevant fuels and activities. In many instances, it is not necessary to follow a pollutant-by-pollutant-approach, especially in cases there no targeted mitigation or abatement technologies exist. For many “low volume” pollutants it is more effective to concentrate on the significant co-benefits associated with technologies targeting conventional “mass volume” pollutants such as SO₂, NO_x or dust (e.g. wet FGD or particulate filters). In some cases, the grouping of various substances of concern can be a useful approach (e.g. for regulating heavy metals or dioxin emissions from waste incineration). Please provide further details to justify your answer including any supporting evidence.

3.1 In relation to the industry/sector you represent, and compared to the previous situation under the IPPC Directive and the sectoral Directives, what impact do you think the IED has had on the following:	Environmental Sustainability	Significant improvement Some improvement Do not know Some improvements to social sustainability through reduction of emissions impacting air quality and associated public health benefits.
	Social Sustainability	
	Economic Sustainability	
	If relevant, please provide further information and supporting evidence for your response.	
3.2 In relation to the industry/sector you represent, what impact do you think the IED has had on the competitiveness of the EU industry?	Response	Do not know
	If relevant, please provide further information and evidence supporting your response.	
3.3 To what extent do you think that the regulation of environmental impacts through the IED and development of BREFs and BAT Conclusions has stimulated innovation in the prevention and control of pollution from industrial activities?	Response	Somewhat disagree
	Requirements for installations to hold a permits	
3.4 Which elements of the IED and BREF process have the greatest impact on driving innovation in the prevention and control of pollution from industrial activities?		Neither positive nor negative

	Monitoring and reporting requirements	Some positive impact
	Enforcement	Neither positive nor negative
	BAT Conclusions	Some positive impact
	Emerging techniques chapter of the BREF	Some positive impact
	a	
3.5 Please provide further details to justify your answers and any supporting evidence.		While the IED and BREF processes may have an impact on driving innovation this is not the objective of the IED. The IED and BREF have for instance driven incremental improvement in, for example, low NOx burners and increased uptake of existing abatement measures to increase the prevention and control of pollution.
3.6 Does the IED remain relevant in view of the need for industry to rapidly adapt to a zero-carbon economy by 2050?	Open-Ended Response	
	Response	Yes

According to article 9.1 IED, Where emissions of a greenhouse gas from an installation are specified in Annex I to Directive 2003/87/EC in relation to an activity carried out in that installation, the permit shall not include an emission limit value for direct emissions of that gas, unless necessary to ensure that no significant local pollution is caused. Decarbonisation of industry including the power sector is driven by the climate and energy policy framework, in particular the ETS. While the IED does not have a role in driving decarbonisation, it does have a role in ensuring high standards of environmental protection. There is an ongoing need to ensure that installations are permitted, adopt BAT etc regardless of the move to decarbonisation. From our sector's perspective, given the pace of change and the need for policy stability, it is hard to see any benefit in revising the Directive – the embedded requirements to update BAT and the generic requirements to ensure EQS are met mean it is “future-proof”.		
	If not, what prevents it from being fit for purpose? Please elaborate to justify your answer and provide details and any supporting evidence.	
	4.1 To what extent do you think that the process to draw up and regularly review best available technique (BAT) reference documents (BREFs) addresses the following?	The most relevant environmental impacts
		The most relevant pollutants
		The most polluting agro-industrial sectors
4.2 To what extent do you think that the BREF process identifies the best available techniques that are the most effective techniques for achieving a high level of environmental protection?	Response	Strongly agree Strongly agree Strongly agree Somewhat agree

4.3 Is the definition of Best Available Techniques (BAT) as set out in the IED appropriate for identifying the techniques that are the most effective for achieving a high level of environmental protection?	Response	Yes
4.4 To what extent do you think that the BREF process identifies the most appropriate associated emission or performance levels for achieving the following?	A high level of environmental protection	Somewhat agree Somewhat agree
	Protecting human health	
	Please provide further details to support your answers and any supporting evidence.	
4.5 Please provide further details to support your answers to the four questions above and any supporting evidence.	Open-Ended Response	4.2 – Some techniques ignore the possible trade-offs between pollutants which consequently reduce their effectiveness in reaching the highest level of environmental protection (e.g. NOx/CO2). Another example of the LCP BREF revision process where cross-media-effects were not sufficiently considered include the neglected applicability restrictions for certain mercury specific reduction technologies such as bromide injection. The technology was regarded to be BAT despite the wide spread concerns of plant operators regarding potential corrosion of plant components and potentially negative impacts on FGD water and by-product recovery.
4.6 Is the composition of the Technical Working Group (TWG) established for each BREF appropriate for the following:	For identifying key environmental issues for a sector	Yes
	For identifying BAT	Yes
	For developing effective BAT Conclusions	Yes

	To help stimulate innovation	Neutral
	If neutral or no, please provide further evidence to support your answer e.g. how could the composition change to better stimulate innovation?	While the IED and BREF processes may have an impact on driving innovation this is not the objective of the IED. See questions 3.4 and 3.5 above.
4.7 How do you think that the following elements of the BREF process have changed under the IED (compared to under the IPPC Directive) and are in line with the guidance set out in Commission Implementing Decision 2012/119/EU?	Identification of key environmental issues	Significant improvement Some improvement Some improvement Some improvement
	Information exchange	
	Identification of BAT	
	Development of BAT conclusions	
4.8 How appropriate is the duration of the process for developing and reviewing BREFs - which is set out in guidance as Commission Implementing Decision 2012/119/EU - for the production of effective BAT conclusions?	Response	About the right length
	Please provide further details to support your answers and any supporting evidence	

4.9 Please provide further details to support your answers to the two questions above and any supporting evidence.		Progress has been made on certain issues (e.g. upfront identification of key environmental issues, collection of wishes, data etc from TWG members) and sometimes based on lessons learned from a BREF exercise to another (e.g. upfront identification of key environmental issues, consistency between averaging periods set in the annexes of the IED and those used in the BREF/BAT conclusions from LCP BREF to WI BREF review processes). However, there is a lack of transparency on the way BAT-AELs are derived during the process. The Guidance document for the exchange of information under IED (Commission Implementing Decision 2012/119/EU) is not fully followed during the BREF making/reviewing process. Its implementation would improve the BREF process. From our experience, the lack of priority for consideration of issues other than emissions to air have produced a difficult position on aquatic emissions in the latest LCP BREF (e.g. installation boundary vs relevant processes, is returned water an ‘emission’?) As well as the process of deriving AELs being opaque, there was no apparent assessment of economic viability nor a cost – benefit assessment, which does not align with the principles of BAT.
4.10 Does the BREF process sufficiently consider the compliance and operational costs associated with techniques when identifying the best available techniques?	Response	Some of the time

4.11 Does the BREF process sufficiently consider the benefits (e.g. emission reductions, improvements in resource use, reduced waste generation) associated with techniques when identifying the best available techniques?	Response	Some of the time
4.12 Does the BREF process sufficiently consider cross-media impacts (i.e. impacts on other environmental issues) in identifying the best available techniques?	Response	Rarely
	Please provide further evidence to substantiate your answers, where relevant.	
4.13 Please provide further details to support your answers to the three questions above and any supporting evidence.	Open-Ended Response	During the LCP BREF review process a pollutant by pollutant approach was followed that neglected trade-offs and cross media effects, particularly in terms of emissions to water. One instance where trade-offs were acknowledged was in the position on CO.
4.14 To what extent do you think that the BREF process has been flexible and fast enough to respond to new or emerging environmental issues?	Response	Agree
	Please provide further information to support your answer, where relevant, with specific examples e.g. where emerging pollutants and/or environmental impacts have been identified during the BREF process but could not be captured in the BAT Conclusions.	

5.1 Has the IED and BAT Conclusions enabled Member States to implement BAT-based permitting?	Response	Yes
5.2 How has the situation changed relative to that under the IPPC and sectoral Directives?	Response	Some increase in BAT-based permitting
5.3 Based on your experience, are emission limit values (ELVs) in permits typically based on upper or lower BAT-AELs (emission levels associated with BAT) or levels in between?	Response	Do not know
	Where relevant, please provide further information and evidence to support your answers.	

5.4 Where relevant, please provide further information and evidence to support your answers, to the three questions above.	BREF LCP. The new BAT conclusions for LCPs agreed in 2017 are still under implementation. In general, the deadline for updating permits and implementing new measures, if needed, is 17 August 2021 for existing LCPs. In some cases, even longer transitional clauses of the IED apply. Hence, it is too early to assess the impact of individual permit setting of the competent authorities and to draw conclusions on ELVs in permits. In some member states, general binding rules will apply, but corresponding legislative procedures have not been finished, yet. However, it is worth noting that as well as ensuring compliance with the BAT-AELs, there are also broader considerations and other obligations – for example “no backsliding” requirements & general BAT obligations in the IED – which inform limits set in permits. Question 5.3 is somewhat misleading. In principle, the upper and lower BAT-AELs do not represent different ambition levels. Both upper and lower BAT-AELs reflect the application of BAT. The BAT-AELs are usually expressed as emission ranges to reflect different fuel properties, technological characteristics, site-specific plant conditions, applicability restrictions. differences in measurement and monitoring as well as differing operational regimes reflecting both short and long term fluctuations of plant performance under normal operating conditions. Only in some cases, the BAT-AEL ranges are explicitly referring to specific technologies (e.g. in the LCP BREF in the case of ammonia, where it is stated that the lower values may be achieved when applying SCR and the higher values when using SNCR). When setting ELVs using upper BAT-AELs the corresponding plant performance will most likely respect the applicable emission ranges with some plants having emission levels close to the upper level and others close to the lower level. In some Open-Ended Response
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5.5 The achievement of emission levels associated with the best available techniques as described in BAT conclusions could potentially lead to disproportionately higher costs compared to the environmental benefits. Article 15(4) of the IED allows for the setting of less strict emission limit values as a derogation from Article IED 15(3). If relevant, please provide details as to how and why this Article has been used/useful for your installation(s) or sector and whether it provides for the flexibility required in the permitting process.		The BAT conclusions for LCPs are under implementation and it is too early to draw conclusions on the use of article 15.4 IED. IED mandates implementation of BREF AELs but the derivation process cannot possibly account for the full range of circumstances. The derogation provision is essential to ensure that the principles of BAT are properly applied – for example to take account of plant coming to the end of its life, plant with an unusual design, to take account of trade-offs between pollutants etc.
5.6 Has the flexibility afforded by Article 15(5) been utilised for installations in your sector to allow competent authorities to grant temporary derogations from BAT-based permitting requirements to allow for the testing and use of emerging techniques?	Open-Ended Response	
	Response Please provide further explanation as to why this Article has been used/useful and whether it provides for the flexibility required in the permitting process.	Do not know

6.1 To what extent do you think that the BAT conclusions are explicit and clear on monitoring requirements e.g. averaging periods:	Response	Disagree
	If neither agree nor disagree or disagree, please provide further details.	In the case of LCP, the BAT conclusions didn't use the same averaging periods that are used for emission limit values set in the IED's Annex V. It is unclear how it will be implemented in practice but this is causing confusing for operators and most likely Member States' Competent Authorities and will result in an increased administrative burden and a scattered implementation. There is also an issue regarding measurement uncertainty: the lower end of BAT-AELs can be either near the measurement uncertainty, close to the detection limit or below the validated range to calibrate monitoring equipment using reference standard methods. An example is mercury. The availability of adequate monitoring methods has not been addressed when BAT-AELs have been derived. This may lead to issues in compliance. In practice, no BAT-AEL can be set below the manufacturer guarantee or the measurement uncertainty. The IED contains broader monitoring provisions than the BREF. It would have been very helpful if the BREF had as a minimum stated that the IED provisions hold unless countermanded by the BREF. We would support increased flexibility to allow realistic site issues to be properly taken into account for monitoring emissions to water for BAT compliance. The installation boundary is not the best place to monitor emissions given the mixing that takes place in many plants and the hostility of the environment at the outfall. Insufficient attention in the BREF discussion has left a significant interpretation issue for Member States' Competent Authorities.

6.2 To what extent do you think that industry reporting activities have been simplified under the IED compared to the situation under the IPPC and sectoral Directives?	Response	Strongly disagree
		For LCPs, the situation has become more complex because of the inconsistency between averaging periods in IED Annex V and the LCP BAT conclusions regarding averaging periods for emissions into air. The IED has introduced various new monitoring and reporting requirements in particular related to soil quality (baseline report), environmental inspections and air pollutants. The monitoring framework of the IED has been timely implemented by the power sector. However, the recently agreed BREF conclusions include a great number of significant new measurement requirements by increasing the number of pollutants and the minimum frequency for monitoring and requiring more continuous measurement than the IED. These additional monitoring provisions significantly increase administrative cost for operators and authorities with little if any tangible environmental benefit.
6.3 To what extent do you think that the provisions of the IED on the following have led to more effective control of the environmental impacts of large industrial installations relative to the situation under the IPPC and sectoral Directives (i.e. prior to the adoption of the IED)?	Please provide further details, if relevant.	
	BAT conclusions	Strongly agree
	Permits	Agree
	Enforcement	Strongly agree
	Access to information	Strongly agree
	Access to justice	Agree

	Please provide further details to justify your answer and any supporting evidence.	Under IPPC BAT conclusions were voluntary, whereas these are mandated under IED.
7.1 By bringing the [permitting, monitoring, reporting] requirements of previously separate Directives together into one instrument, to what extent do you think that the IED has achieved the following relative to the previous regime:		
	Clarification of the provisions	Strongly agree
	Simplification of the provisions	Somewhat agree
7.2 Has the implementation of the IED led to a reduction in unnecessary administrative burden for industrial installation operators?	Response	No
	Please provide further information and evidence to support your answers, where relevant, including any estimates of administrative burden for your installation or sector.	
7.3 Please provide further information and evidence to support your answers, where relevant, including any estimates of administrative burden for your installation or sector.		While the IED as such may have reduced administrative burden, in the case of the power sector, the implementation of the BAT conclusions for LCPs is likely to increase the administrative burden because of e.g. the discrepancies between averaging periods (see above answers to questions 6.1 and 6.2).
7.4 Are there significant differences in IED and BATC implementation between Member States for your sector?	Open-Ended Response	
	Response	Do not know

7.5 For any identified differences in IED implementation between Member States for your sector, please provide further information on the root causes for these differences and any quantified information on how they affect the costs borne by your sector's installation operators or impacts on environmental pollution.		The BAT conclusions for LCPs are under implementation and it is too early to draw conclusions.
7.6 To what extent do you think that the IED has contributed to achieving a level playing field in the EU for your sector(s) by aligning environmental performance requirements for industrial installations (compared to the previous legislative regime of the IPPC Directive and sectoral Directives).	Open-Ended Response	
	Response If relevant, please provide further details and evidence to support your answer.	Agree Note that the power sector already had a comprehensive set of ELVs in the frame of the LCPD 2001/80/EC so the IED was not a breakthrough from this point of view.

7.7 Please provide evidence of the compliance, administrative, monitoring and reporting costs, and of the benefits, for your installation and/or sector that are associated with implementing the IED's requirements which go beyond those that would have occurred under the previous legislative regime of the IPPC Directive and the sectoral Directives. Please provide quantitative evidence where possible, separating out different cost or benefit contributions. Please exclude time spent on the BREF process (covered in separate question). Benefits may include monetary and non-monetary benefits e.g. changes in emissions, resource use or waste generation. Please specify the geographic level to which your response refers (i.e. regional, national or EU).	Open-Ended Response	The BAT conclusions for LCPs are under implementation and it is too early to provide evidence. To provide substantive evidence of the compliance, administrative, monitoring and reporting costs requires an intensive EU wide analysis that cannot be elaborated within the short commenting period of the questionnaire. However see questions 6.1 and 6.2.
7.8 To what extent do you think that the benefits that the IED has achieved have been achieved in a cost-effective manner.	Response	

	Please provide further information and supporting evidence.	
7.9 Could the IED have been implemented more efficiently whilst still delivering its overall objectives and minimising unnecessary costs?	Response	Yes
	If yes, please provide further details and supporting evidence.	See answer to question 7.8.
7.10 For your sector, please confirm which BREF(s) development/ reviews(s) if any, you are involved in. For these, please estimate the staff time (i.e. number of person-days in Full Time Equivalent) spent by your company or association (please specify) including external support by a third-party, on contributing to the information exchange for each BREF.	Common Waste Waster and Waste Gas Treatment/ Management Systems in the Chemical Sector (CWW)	
	Common Waste Gas Treatment in the Chemical Sector (WGC)	
	Ferrous Metals Processing Industry (FMP)	
	Food, Drink and Milk Industries (FDM)	

In the case of the power sector and LCPs, a better consistency with the climate and energy policy framework, in particular the compliance timeline, would have improved the cost-effectiveness of the implementation of the IED. The transformation in the power sector is largely driven by the implementation of the climate and energy policy framework with key milestones in 2020 (and 2030/2050). The distinct timeline of the IED with key milestones in 2013, 2016, 2020, 2021 and 2023 resulted in a less than optimal implementation schedule for operators.

	Intensive Rearing of Poultry or Pigs (IRPP)
	Iron and Steel Production (IS)
	Large Combustion Plants (LCP)
	Manufacture of Glass (GLS)
	Non-ferrous Metals Industries (NFM)
	Production of Cement, Lime and Magnesium Oxide (CLM)
	Production of Chlor-alkali (CAK)
	Production of Large Volume Organic Chemicals (LVOC)
	Production of Pulp, Paper and Board (PP)
	Refining of Mineral Oil and Gas (REF)
	Surface Treatment Using Organic Solvent (including Wood and Wood Products Preservation with Chemicals) (STS)
	Slaughterhouses and Animals By-products Industries (SA)
	Smitheries and Foundries Industry (SF)
	Tanning of Hides and Skins (TAN)
	Textiles Industry (TXT)
	Waste Incineration (WI)
	Waste Treatment (WT)

Large Combustion Plants (LCP) >1000 days for the power sector (including Secretariat work, preparation and active participation in TWG meetings, engagement in sectoral and national shadow groups, drafting and compiling technical comments to the first and final drafts, as well as filling in and assessing reference plant questionnaires

Waste Incineration (WI)>500 days
Waste Treatment (WT)>100 days

	Wood-based Panels Production (WPP)	
8.1 To what extent has the IED improved public access to information on the following relative to the situation under the IPPC Directive:	Granting of a permit Updating of a permit Details of permits granted and conditions contained therein as set out in Article 24 of the IED Environmental performance of installations Derogations	Some improvement Some improvement Some improvement Some improvement Some improvement
8.2 Are permit(s) for your installation / sector easily accessible and available via the Internet?	Response	Yes
8.3 Please provide any further information and supporting evidence.	Open-Ended Response	
9.1 To what extent is the IED internally consistent and coherent among its chapters and provisions?	Response	Moderately consistent The relationship between IED Chapter 2 (including BREF/BAT) and IED chapter 3 (specifically for LCPs) could have been more explicit in order to avoid time-consuming discussions by the TWG during the BAT process regarding the validity of IED chapter 3 definitions (aggregation rule, compliance rule,...), derogations (NERP, CHP, limited lifetime derogation) and provisions (less than 1500 h/y combustion installation, etc) in the frame of the IED chapter 2 BAT elaboration.
9.2 If relevant, please provide details of any cases of overlaps, contradictions or other inconsistencies between provisions / requirements of the IED.	Open-Ended Response	

9.3 Are there any inconsistencies, contradictions, unnecessary duplication, overlap or missing links between provisions and activities listed in IED Annex I?	Response If yes, please provide further details.	No
9.4 Are the boundaries of the activities in Annex I clear and appropriate?	Response If no, please provide further details.	Yes
9.5 To what extent does the IED contribute to the achievement of the objectives of the following EU environmental policy areas:	Air quality	Some positive contribution
	Water quality	Some positive contribution
	Circular economy	Do not know
	Waste management	Some positive contribution
	Sustainable use of resources	Some positive contribution
	Chemical risks and hazards	No contribution
	Energy	No contribution
	Climate change	No contribution
9.6 Are there any cases of overlaps, contradictions or other inconsistencies between objectives and provisions / requirements of the IED and the following EU environmental policy areas:	Air quality	No
	Water quality	Yes
	Circular economy	No
	Waste management	No
	Sustainable use of resources	No
	Chemical risks and hazards	No
	Energy	Yes

	Climate change	Yes
	If relevant, please provide details of any possible overlaps, contradictions and/or inconsistencies as well as any changes that might be needed to better contribute to these objectives.	Water quality: the interplay between LCP BREF AELs and WFD EQS appears to cause some issues for some Member States in practical permitting. It is important to extend and promote the concept of mixing zones to substances other than PS/PHS to make it work. There are complications because there was insufficient attention to the setting of aquatic emissions BAT-AELs and monitoring BAT arrangements which have left a difficult interpretation issue for Member States. Climate/Energy: although the provisions of the respective legislative framework may not be substantially incompatible, the timing of their adoption and subsequent implementation can be inconsistent and increase uncertainty for operators and their investment decisions. The IED timeline was not necessarily consistent with the EU 2020 –and beyond- climate and energy policy objectives in this regard. It is crucial that any future industrial emission policy is fully consistent with the EU's 2030 energy and climate policy and its implementation timeline to achieve better environment and human health in a cost-effective approach.
9.7 Are there any cases of overlaps, contradictions or other inconsistencies between objectives and provisions / requirements of the IED and Regulation (EC) 166/2006 establishing the European Pollutant Release and Transfer Register (E-PRTR)?	Response	No

	If relevant, please provide details of any possible overlaps, contradictions and/or inconsistencies as well as any changes that might be needed to better contribute to these objectives.	There is a particular lack of clarity on defining an emission for emissions to water (e.g. returned intake water).
10.1 To what extent do you think that legislation to regulate environmental impacts of large industrial installations at the EU level, as opposed to action solely at the national level, helps the following?	To better protect human health and the environment	Significant benefit
	To ensure that national competent authorities address industrial pollution	Significant benefit
	To avoid competition on environmental standards	Significant benefit
10.2 Do the issues tackled by the IED (for example, preventing, reducing and eliminating as far as possible, pollution arising from industrial activities) continue to require action at the EU level?	Response	Yes
	If relevant please provide further details and evidence to support your answers.	There is a need for the issues covered by the IED to continue to have the existing legislative provisions in place to ensure high standards of environmental protection and to provide policy stability and clarity. However, the IED is an effective and robust piece of legislation and remains fit for purpose, particularly noting that it has provisions to allow for the updating of BAT conclusions and to ensure that Environmental Quality Standards are met – these provisions ensure the IED is “future-proof”.

[illegible]

You will find at the following link Eurelectric's key messages on the IED Fitness Check (together with our complete answers to this consultation and the public consultation):
https://www.eurelectric.org/media/3987/ied_consultations-2019-030-0485-01-e.pdf

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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