

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12306-EU-rules-on-industrial-emissions-revision>

Industrial emissions – EU rules updated

About this initiative

Summary

This initiative would update EU rules on industrial emissions to ensure industry keeps improving the EU environment.

It aims to ensure industry uses techniques that create a more sustainable EU economy, and a cleaner environment that improves public health.

In this way, the initiative supports the zero pollution ambition under the European Green Deal, as well as the EU policies on energy, climate and the circular economy (reducing resource consumption and waste generation and promoting the use of recycled materials).

Topic

Environment

Type of act

Proposal for a directive

FEEDBACK EiiF

The EiiF strongly supports the initiative to update EU rules on industrial emissions. We encourage this initiative in its aim to ensure industry uses techniques that create a more sustainable EU economy, and a cleaner environment that improves public health.

Our expertise lies in the very specific field of industrial insulation, a cross-cutting BAT delivering multiple benefits to industry: process and safety needs, cost reductions, energy savings and connected emission reductions urgently needed for a transition to a low carbon industry.

However, contrary to the building sector, the energy efficiency and emission reduction potential of insulation in industry is not used today. The consequences are largely untapped energy and emission reduction potentials. According to an Ecofys study, specifically on the industrial insulation potential (Climate protection with rapid payback, 2012), and latest figures investigated by EiiF (based on the 2017 emission data provided by the EEA), the annual reduction potential of industrial insulation sums up to 50 Mt CO₂ and an energy saving potential of 600 PJ. These potentials are equivalent to the emissions of at least 15 million cars and the energy consumption of about 10 million households.

In fact, industrial insulation could annually reduce about 1% of Europe's CO₂ emissions (or about 5% of EU industry emissions), thus offering a cleaner environment to European citizens. Furthermore, investments in industrial insulation give rapid payback (see EE-BREF page 153).

Against this background we see a great opportunity in the enforcement of EU rules on industrial emissions. We therefore recommend the following suggestions for the IED's revision:

1. **The horizontal Energy Efficiency BREF must become mandatory (including SMEs). If not, industry will continue to consider it irrelevant and the EU goals will not be met.**
2. **The Energy Efficiency BREF must be updated and improved:**

- a. **Insulation specific:**

Mandatory minimum requirements for insulation defined by maximum heat loss rates similar to the existing building insulation standards must be introduced: With the lately released VDI 4610 energy classes for industrial insulation an effective tool is now available (see attachment).

Today the EE-BREF is too vague and in particular misses out the huge energy efficiency potential of insulating equipment at temperature levels below 200 °C:

- i. “As a baseline, all piping operating at temperatures **above 200 °C** and diameters of more than 200 mm **should be insulated** and good condition of this insulation **should be checked** on a periodic basis [...]” (Page 153, Chapter 3, Steam pipes)
- ii. “ensuring insulation is **optimized**” (Page vi/Executive Summary) – No guidance at all.
- iii. “An optimum insulation thickness which relates energy consumption with economics should be found in every particular case” (Page 132, Chapter 3, Combustion) – No guidance at all.

- b. **General:**

The structure and formatting must be corrected to transfer the BREF into a motivating, user-friendly document. (See attachment)

3. **The duration of the general process for developing and reviewing BREFs is too long and too complex.**

For the EE-BREF the process took almost 6 years and the revision every 8 years has not happened. The current BREF process makes it furthermore impossible to introduce innovations and younger best practices in due time. A more efficient process would enable the IED to ensure that industry uses more and new innovative techniques creating a more sustainable EU economy.

We propose to change the BREF process to enable a duration of not more than one year, and a revision every 4 years.

We strongly encourage DG Environment on the revision of the Industrial Emissions Directive and offer any support we can give to ensure industry uses the insulation BAT in its best way to create a more sustainable EU economy, and a cleaner environment that improves public health.