European Industrial Insulation Foundation (EiiF)

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Proposal for a directive: **Industrial emissions – EU rules updated**

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

FEEDBACK FROM THE **EUROPEAN INDUSTRIAL INSULATION FOUNDATION** (EiiF)
June 2022

SUMMARY AND MOST IMPORTANT EiiF RECOMMENDATIONS

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, energy independent EU economy and a cleaner environment that improves public health.

We see a great opportunity in the enforcement of EU rules on industrial emissions and therefore we recommend the following measures:

GENERAL:

- Mandatory horizontal Energy Efficiency BREF or integration of all cross-cutting energy-efficiency technologies to be used in specific vertical BREFs
- A more efficient BREF process aiming for a duration of no more than one year, with a revision every 4 years

INSULATION SPECIFIC:

- Introduction of energy classes for industrial insulation to define the energy efficiency performance of industrial insulation systems
- Introduction of mandatory minimum requirements for insulation defined by maximum heat loss rates like the existing building insulation standards

Increased activity in the field of industrial insulation can contribute in a financially attractive way to decarbonising industry as well as providing and saving jobs in Europe.

The installation of new and better performing insulation solutions as well as the repair work can be done right here in Europe by European insulation workers, and most insulation materials used in industry can also be produced in Europe.

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EiiF FEEDBACK ON THE INCEPTION IMPACT ASSESSMENT

IMPACT ASSESSMENT, PAGE 1, A. Context, problem definition and subsidiary check

We fully support aiming for the requirement for industrial operators to use BAT. Our expertise lies in the specific field of industrial insulation, a cross-cutting BAT delivering multiple benefits to industry: process and safety needs, cost reductions, energy savings and emissions reductions needed for a transition to a low carbon industry and to make the EU less dependent on energy imports. Contrary to the building sector, the potential of industrial insulation remains untapped today, despite being urgently needed in order to reach the climate targets.

IMPACT ASSESSMENT, PAGE 2, B. Objectives and policy options: BREF process

In our opinion, the duration of the general process for developing and reviewing BREFs is too long and too complex. The EE-BREF process took almost 6 years in total, and the revisions every 8 years have not taken place. Furthermore, the current BREF process makes it impossible to promptly introduce and apply innovations and younger best practices. A more efficient BREF process that enables industry to easily adopt new, innovative technologies would help create a more sustainable EU economy. We propose to aim for a process duration of no more than one year, with a revision every 4 years.

IMPACT ASSESSMENT, PAGE 2, B. Objectives and policy options: EU legislation

Mandatory minimum requirements for insulation defined by maximum heat loss rates, like the existing building insulation standards, must be introduced. With the VDI 4610 energy classes for industrial insulation already incorporated in the German DIN 4140 norm as a recommendation, an effective tool is now available. In addition, a TC 228 working group is currently working on the development of a European norm defining insulation energy classes.

IMPACT ASSESSMENT, PAGE 2, C. Likely economic impacts

The significant potential technical insulation offers remains untapped today even though the investment pays itself back very quickly, especially considering today's situation with the rising energy and CO_2 prices. The EiiF Study 2021 analyses that 14 Mtoe of energy could be saved by improving insulation standards in industry, offering the potential to reduce EU's CO_2 emissions by 40 Mt every year. This potential is equivalent to the emissions of more than 20 million cars and the energy consumption of more than 10 million households.

IMPACT ASSESSMENT, PAGES 2–3, C. Likely social impacts

2.500 TIPCHECK energy audits have been carried out so far and in all of them, social benefits resulting from insulation improvements were identified. Most commonly the benefits have to do with improved safety: reduced surface temperatures result in fewer accidents at work and well-maintained insulation systems reduce the maintenance needs, and therefore, costs. Furthermore, temperatures that are more constant guarantee better product quality. In terms of benefits for staff, insulation improvements most often come with noise reduction, and more constant temperatures

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eliminate working environments that are either too hot or too cold, significantly reducing occupational diseases and sickness related leave.

IMPACT ASSESSMENT, PAGE 3, D. Evidence base, data collection and better regulation instruments

We have a large database and experience based on 2.500 TIPCHECKs, as well as a comprehensive EiiF Study 2021 on the insulation contribution to decarbonise industry, and we offer any help we can give to support this initiative.

FURTHER INFORMATION ON TECHNICAL INSULATION POTENTIAL

There is a significant energy savings and emissions reduction potential related to improved thermal insulation in EU 27 industry. This potential is currently untapped despite its being financially attractive to implement, its offering multiple benefits to industry and the environment and its being urgently needed to help the EU become carbon neutral in 2050.

EiiF's TIPCHECK experience shows that industry is using insulation systems which are neither cost-effective under current market conditions nor energy efficient. Old and outdated technical specifications, mainly focusing on process and safety requirements, are still widely used in industry today. It is also observed that, in many cases, thermal insulation in industry is poorly maintained and parts remain uninsulated. This practice results in excessive heat losses and, consequently, high levels of avoidable greenhouse gas emissions. TIPCHECK energy audits can quickly identify the potential savings. The payback times of technical insulation improvements like insulating bare surfaces and repairing damaged insulation systems are short, often less than 2 years, as proven by 2.500 TIPCHECKs, and mentioned in the EED Evaluation, PDF page 255 of directive 2012/27/EU on energy efficiency which accompanies the Proposal for a Directive of the European Parliament and of the Council on energy efficiency (recast). With today's rising energy and CO_2 prices, the payback times can even be less than one year.

Environmentally, the TIPCHECK impact is powerful: over the last 10 years, TIPCHECKs have resulted in total energy savings of 4.000.000 MWh and emissions reductions of 1.000.000 t CO_2 eq. On average 3 out of 4 clients decide to invest in insulation after a TIPCHECK energy audit.

EiiF has investigated the savings potential by improving thermal insulation in EU industry, including the electricity sector. The EiiF Study 2021 analyses that 14 Mtoe of energy could be saved by applying energy class C insulation systems according to VDI 4610 Part 1, offering the potential to reduce EU's CO_2 emissions by 40 Mt every year. This potential is equivalent to the emissions of more than 20 million cars and the energy consumption of more than 10 million households.

Improving insulation standards in industry would quickly deliver multiple benefits not only for our climate but also for the EU and for its industry. The insulation technology needed already exists and just needs to be better utilised. Tailored policy actions could significantly accelerate the uptake.