

## 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>

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### **Eiif FEEDBACK - SUMMARY**

European Industrial Insulation Foundation (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.

As stated in the Inception Impact Assessment, industry is likely to need to make significant investments in the future to support the move to climate neutrality. 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 emissions reductions urgently needed for a transition to a low carbon industry and to make the EU less dependent on energy imports.

[The Eiif Study 2021](#) analyses that 14 Mtoe of energy can be saved by improving insulation standards in industry, offering the potential to reduce EU's CO<sub>2</sub> emissions by 40 Mt every year. This potential is equivalent to the emissions of more than 20 million cars and the energy consumption more than 10 million households.

TIPCHECK energy audits could quickly identify the savings. The payback times of technical insulation improvements like insulating bare surfaces and repairing damaged insulation systems, are often less than 2 years, as 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<sub>2</sub> prices, the payback times can even be less than one year.

We see a great opportunity in the enforcement of EU rules on industrial emissions. We therefore 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 support the decarbonising of 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 are produced in Europe.