

# Position paper

## Key messages for the revision of the Industrial Emissions Directive

**IED DIRECTIVE 2010/75/EU**

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**To keep a competitive and transformative steel industry** in EU some flexibility must remain in the future permits (e.g. intervals and derogation). Increased time periods to facilitate development and testing of emerging techniques (ET) are welcomed in existing installations.

**Respect the existing full definition of BAT.** Don't introduce binding limits for emissions for emerging techniques (ET-AEL) in the test phase as this risk harming innovations and the development of transforming the industry.

**The non-binding performance levels (BAT-AEPL) need to remain** to foster resource efficiency and circular economy. Setting legally binding rules for specific energy consumption (energy efficiency) will be counterproductive not only for more resource efficient, advance, specialized steel but also for the integrated approach (material, chemicals, water).

**Avoid excessive burdens** that affect the efficiency of policy instruments, e.g. ETS (keep IED Article 9.1 for the ETS-sector), REACH (Chemicals strategy says one substance, one assessment), Landfill directive and MPC-D.

**Continue to develop Seville process.** Setting of legally binding BAT-AELs needs continue following the BREF Guidance, based on the data collection exercise, knowledge of the conditions in different sectors and verified by the Member States.

**Remain subject matter and scope** – to keep IED continuous efficient. Include only what is EU-wide issues (e.g. Annex 1 and 2) and respect the integrated approach for the environment taken as a whole (cross-media effect).