



Working with BREF in EUfishmeal

Killybegs, 14th of september 2017



About the Industrial Emissions Directive

- Legal framework for permitting industrial installations
- Revised in 2010
- Main purpose: to create level playing field and environmental protection within EU
- SA BREF includes sectors such as:
 - Slaughterhouses
 - Rendering companies such as DAKA
 - Fishmeal
- Only animal raw materials (other than exclusively milk) with a finished product production capacity greater than 75 tonnes per day; (IE Directive, Annex I)



Key points in the BREF

- Based on the BREF The Commission will lay down:
“The BAT conclusions and the emission levels associated with the best available techniques, associated monitoring, associated consumption levels”.
- The directive does not dictate any usage of specific technologies in production but it does dictate that the emission levels are based on the BAT- conclusions
- Important: The conclusions will be legally binding



Best Available Technique (BAT)

- The most effective and advanced stage in the development of activities and their methods of operation
- Provides the basis for emission limit values and other permit conditions
- Includes both the technology and how it is operated
- Industrial scale and economically and technically viable in the sector
- Impact on the environment as a whole

BREF = **BAT**-reference document

- Result of the exchange of information in particular applied techniques, present emissions and consumption levels as well as BAT conclusions

The importance of being a part of the revision process

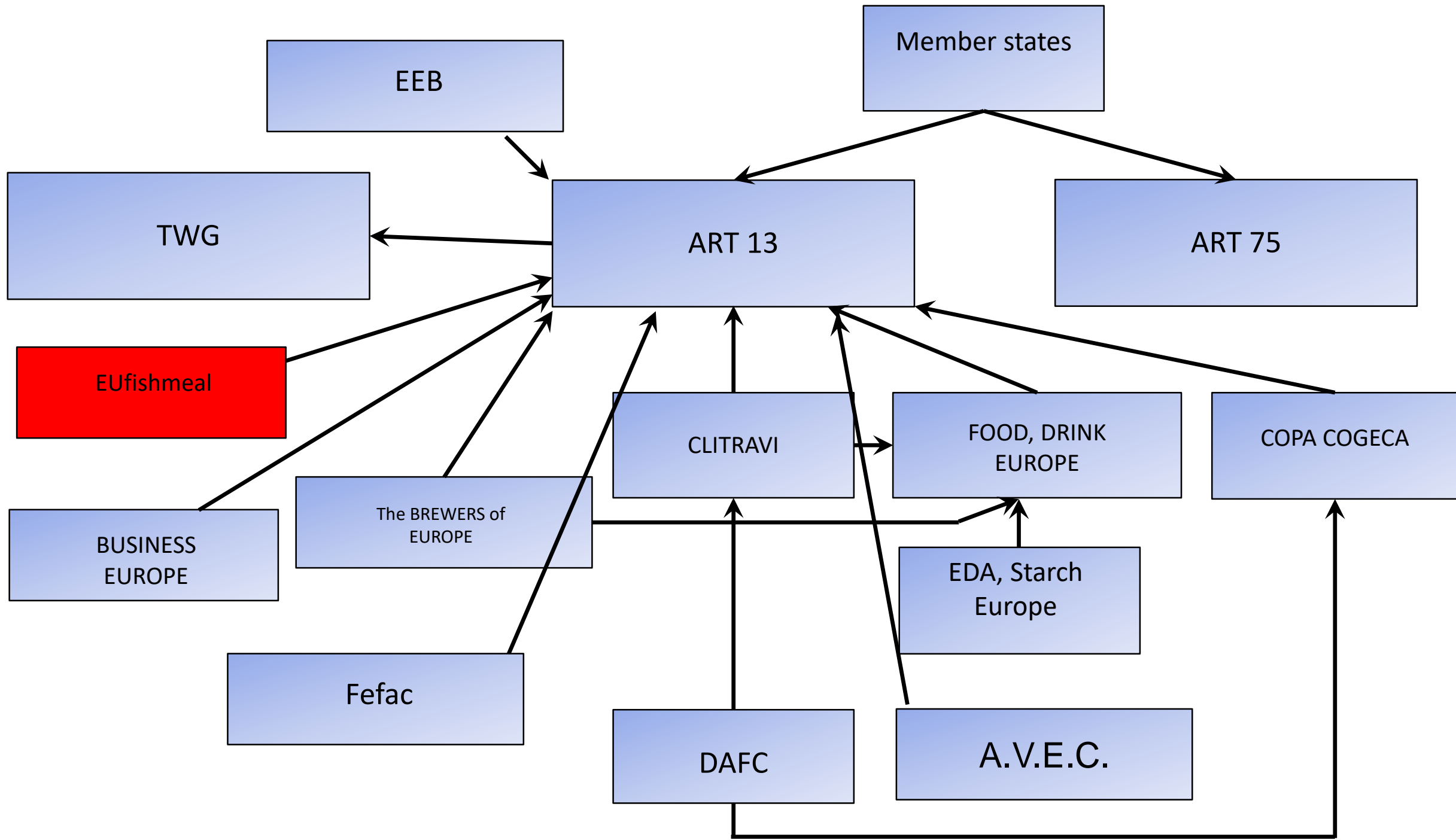


- Influence on BAT-conclusions and thereby future emission levels
- Only chance to affect the legally binding conclusions
- Potentially economic impact
- Secure that data are accurate and validated

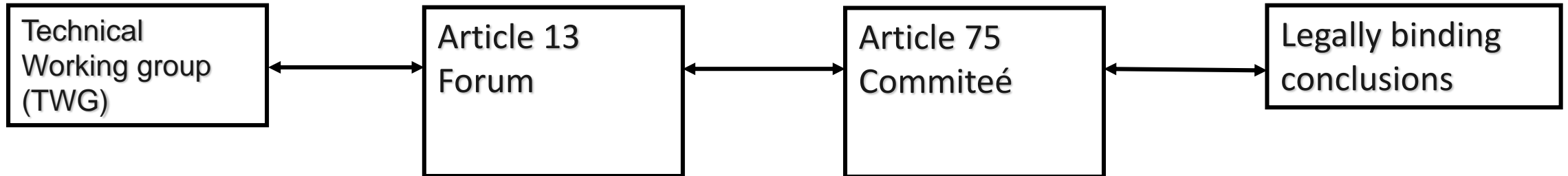
How is the IE-Directive relevant for EFTA countries and Faroe Islands?



- EEA (the Agreement on the European Economic Area) – dictates that the directives under the trade agreement are to be directly implemented under national legislation
- The Faroe Islands adopt the EU-legislation in the extent seemed fitting



The Process of the BAT-conclusions



Seville

- JRC/Commission
- Member States
- Industry
- NGO

Brussels

- Commission
- Member States
- Industry
- NGO

Brussels

- Commission
- Member States

4 years later

- Implementation at national level

EUfishmeal actions



- BREF-revisions was decided to be a common EUfishmeal project at the GA in 2015.
- Since then we have obtained a seat in the article 13 forum and the TWG
- We have established a Technical Working Group with technical experts from each member country
- Benchmarked the factories regarding compliance with the present BAT conclusions and emission levels
- Produced a report describing the productions process and the environmental impact of the process across EUfishmeal members.
- Invited the SA BREF responsible to participate in the EUfishmeal conference and factory visit

Benchmark report by NC Consult



During the fall 2016 and spring 2017, EUfishmeal produced an industry benchmark report together with NC Consult. The report benchmarked all the EUfishmeal fishmeal and fish oil factories on their compliance with the current SA BREF from 2005, consumption of natural resources and emission levels. The report contains sensitive information and is therefore classified.

The report provided no obvious recommendations on individual BAT-conclusions to be used for coming BAT-AELs, but the report demonstrated huge differences between the factories on:

1. the level of implementation of existing BAT-conclusions,
2. the national and even local regulation of the factories and
3. actual consumption of natural resources and emission outlets.

A take-away point from the benchmark was that the revision would be a challenge for the industry, and that there was a risk of a one-size-fits-all approach from the Sevilla office meaning that all factories should be equal on all parameters based on best in class.

The internal EUfishmeal TWG identified a need for additional work



- In march 2017 the internal Eufishmeal TWG identified a need for additional work to build on the benchmark-report
- It was decided to prepare an additional report including:
 - Step-by-step technical description of production process and techniques showing both the similarities and differences between factories
 - Achieved environmental benefits
 - Comments on the scope and overlapping with other BREFs
 - Special recipient conditions
 - EUfishmeal recommendations in general and on specific present BAT-conclusions
- National subgroups was formed
- Feed-back has been very detailed, but not recieved from all subgroups

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Some provisional key points from the EUfishmeal input-report



- FM and FO should have its own and separate section in the BREF-document.
- Avoiding a BAT-AEL on raw material (TVN), - unrealistic to control and will lead to waste of valuable raw materials
- EUfishmeal recommends setting different BAT-AEL's on emissions depending of factory productions size
- The industry finds it hard to fulfil the limits of NO_x according to BREF for large or mid-size combustion plants due to the Nitrogen contents in the excess air that is burned for smell reduction
- As the outlet from FM and FO production to sea is mainly nutrients the harm it dos on environment depends very much on local recipient conditions. The EU regulation on surrounding waters should be taken into account when deciding on emission levels for the single factories. Also, the receiving environment should be modelled to determine assimilative capacity
- BAT-conclusions should reflect the industry's very varying production during the year and from year to year.
- Include a Socio-economic perspective
- Setting BAT-AELs on TMA or DMA should be avoided
- The report will also argue for the deletion or re-formulation of 5-10 others BAT-conclusions from the present SA BREF (2005)



EUfishmeal future actions

- Gather the missing information to the EUfishmeal input-report
- Finish the input-report and discuss disagreements in the TWG
- Submit the input-report to the Sevilla office when SA BREF revision is activated
- Take part in meetings in the TWG in Seville and Article 13 forum meetings
- Arrange meetings in the EUfishmeal TWG if necessary
- Assist EUfishmeal members in the data collection process
- Comment on the SA BREF-drafts
- Presentation by Marine Ingredients Denmark at “The BREF day” hosted by the Danish Environmental Protection Agency. Approx. 150 participants. (Cph, november)