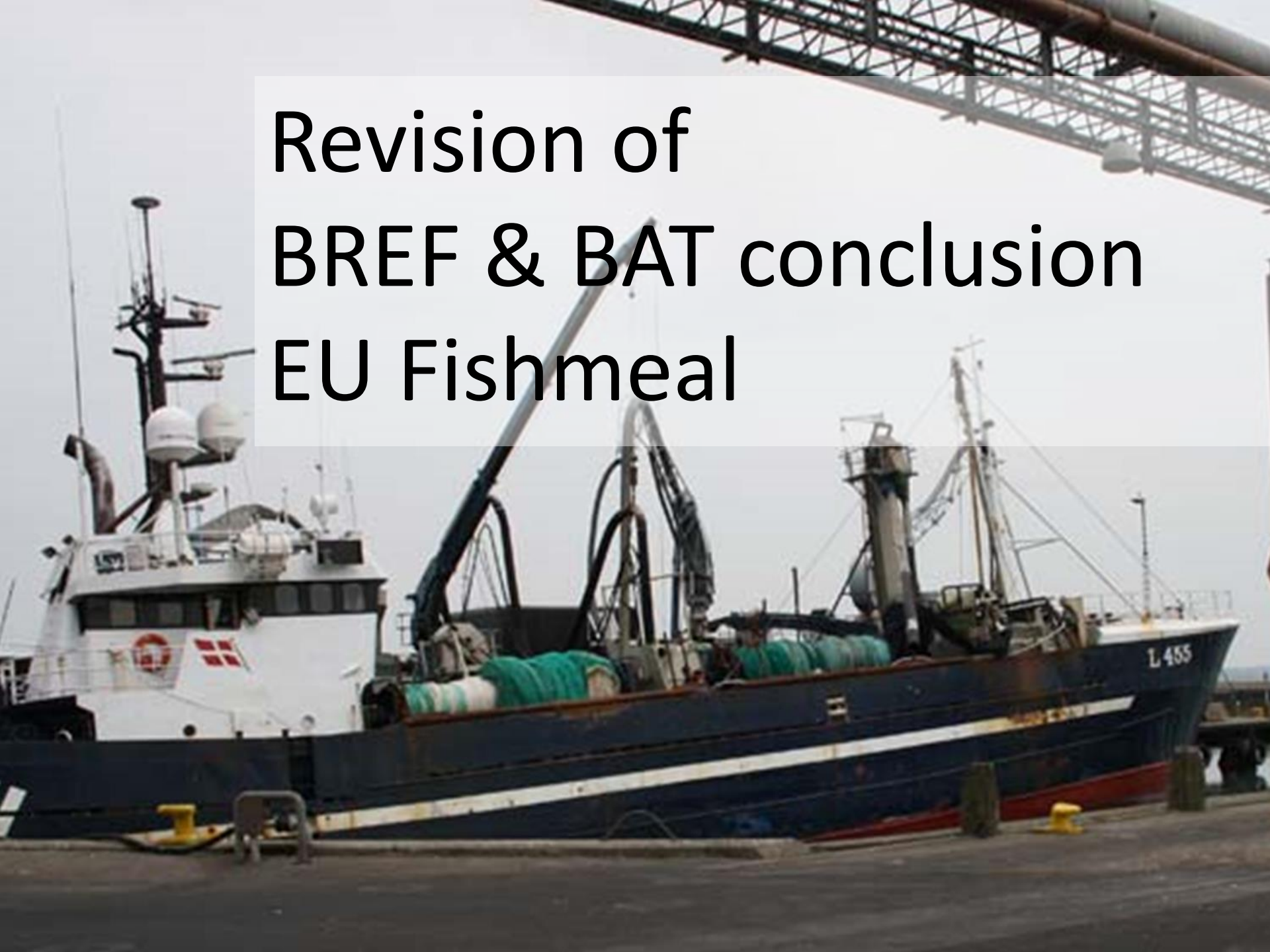


# Revision of BREF & BAT conclusion EU Fishmeal



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# SUMMARY

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- > BAT conclusions
  - > will set up **mandatory** Emission Limit Values
  - > **mandatory** for all facilities to comply with within 4 years
  
  - > mandatory for **all facilities in the EU and the EEA**
  - > can **affect environmental requirements globally**
  
- > If the Fishmeal Industry wants to influence the BAT conclusion
  - > **active (and comprehensive) action is needed**
  - > **early action is necessary**

# The BREF-proces

(Indicated time is the duration of the individual step)

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	Call for wishes	1 – 2
3	Kick-off meeting in (TWG)	1 – 2
4	New information from installations	6
5	First draft BREF	4 – 6
6	TWG comments (possible meeting)	2 – 3
7	(optional second draft and TWG comments)	5 – 10
8	Final TWG meeting	3 – 5
9	Final draft BREF	4
	<i>Total</i>	<i>26 - 38</i>

Steps and expected time based on "Commission Implementing Decision of 10 February 2012 laying down rules ... on ... BAT reference documents." (2012/119/EU)

# The BREF-proces

Focus on individual steps

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	Call for wishes	1 – 2
	<b>Criteria of succes</b>	<b>Risk</b>
	Final draft takes interests of the Fishmeal industry into account	The draft includes technologies and emission limit values in conflict with the interests of the Fishmeal industry
		<b>Action to mitigate</b>
		The Fishmeal industry participates actively in commenting the draft(s) – overviewing the proposed technologies and emission limit values.
8	Final TWG meeting	3 – 5
9	<b>Final draft BREF</b>	4
	<i>Total</i>	<i>26 - 38</i>

Steps and expected time based on "Commission Implementing Decision of 10 February 2012 laying down rules ... on ... BAT reference documents." (2012/119/EU)

# The BREF-proces

Focus on individual steps

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	Call for wishes	1 – 2
3	Kick-off meeting in (TWG)	1 – 2
4	New information from installations	6
5	<b>First draft BREF</b>	4 – 6

Criteria of succes	Risk	Action to mitigate
First draft is based on valid and relevant data on performance in the European Fishmeal industry	The data collected does not sufficiently illustrate the limitations in the Fishmeal industry's ability to limit emissions – and the limitations in relevans of this	The Fishmeal industry actively ensures collection of data illustrating the conditions in the Fishmeal industry – and actively ensures correct interpretation of these data

# The BREF-proces

Focus on individual steps

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	Call for wishes	1 – 2
3	Kick-off meeting in (TWG)	1 – 2
4	<b>New information from installations</b>	6

Criteria of succes	Risk	Action to mitigate
Relevant information is collected from the Fishmeal industry – to illustrate the challenges in the industry.	Individual facilities in the industry have not time/ressources for providing relevant information to the EU	EU Fishmeal provides assistance to its members aiming at easing the collection and communication of data from the individual facilities.

Steps and expected time based on "Commission Implementing Decision of 10 February 2012 laying down rules ... on ... BAT reference documents." (2012/119/EU)

# The BREF-proces

Focus on individual steps

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	Call for wishes	1 – 2
3	<b>Kick-off meeting in (TWG)</b>	1 – 2
4	New information from installations	6
		<i>Total</i>
		<b>26 - 38</b>

Criteria of succes	Risk	Action to mitigate
The TWG decides to collect information in a way that reflects the relevant challenges within the Fishmeal industry	The methodology chosen for data collection will not reflect the relevant challenges within the Fishmeal industry	At the kick-off meeting the Fishmeal industry presents clear views on which information to be collected and which parts of the BREF to be revised.

Steps and expected time based on "Commission Implementing Decision of 10 February 2012 laying down rules ... on ... BAT reference documents." (2012/119/EU)

# The BREF-proces

Focus on individual steps

	Step	Time (months)
1	Reactivation of Technical Working Group (TWG)	
2	<b>Call for wishes</b>	1 – 2
3	Kick off meeting in (TWG)	1 – 2

Criteria of succes	Risk	Action to mitigate
The kick-off meeting in the TWG is based on solid understanding of the special conditions in the Fishmeal industry – and an understanding of unclear BAT-levels currently presented in the BREF	The kick-off meeting is prepared without an understanding of the conditions in the Fishmeal industry	The Fishmeal industry delivers relevant input to EIPPCB - providing a preliminary overview on the relevant environmental issues in the industry

Steps and expected time based on "Commission Implementing Decision of 10 February 2012 laying down rules ... on ... BAT reference documents." (2012/119/EU)



# Proposed Action (1)

Prior to kick-off meeting in TWG

*"Provide a preliminary overview on the relevant environmental issues in the Fishmeal industry":*

Action	Amount of time
Benchmark of environmental performance of facilities of EU Fishmeal member facilities	8 days
Clarification of specific areas of concern	7 days
Synthetization of data for presentation at TWG Kick-off meeting	5 days

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# Proposed Action (2)

Prior to kick-off meeting in TWG

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## **Benchmark of environmental performance of facilities of EU Fishmeal member facilities**

- NIRAS prepares a questionnaire on
  - Technology applied
  - Environmental performance
  - Nature of surroundings
- NIRAS prepares a request for receipt of environmental permits
- Marine Ingredient distribute questionnaire to all facilities

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# Proposed Action (3)

Prior to kick-off meeting in TWG

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## Clarification of specific areas of concern

- NIRAS compares the environmental performance of the individual facility with the nature of the surroundings, the technical capability and the environmental regulation
- Based on the comparison potential areas of concern are identified

*The more data, the better clarification.*

*Benchmarking will not be better than the quantity of responses from the members.*

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# Proposed Action (4)

Prior to kick-off meeting in TWG

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## **Synthetization of data for presentation at TWG Kick-off meeting**

NIRAS prepares a presentation of the results of the benchmark analysis.

The presentation will include specific recommendations on the upcoming data collection process – including

- which data is relevant
- which data should *not* be considered
- possibly examples on wording of specific questions

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## Proposed Action (5)

After kick-off meeting

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*"The EU Fishmeal provides assistance to its members aiming at easing the collection and communication of data from the individual facilities."*

### Action

Assistance to individual facilities on collection and communication of data

Interpretation of collected data and communication to the EIPPCB

The amount of time of assistance is expected to be approximately 1 day / week from the kick-off meeting until the the BREF document is ready.

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## Proposed Action (6)

During drafting of BREF

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*"The Fishmeal industry actively ensures collection of data illustrating the conditions in the Fishmeal industry – and actively ensures correct interpretation of these data"*

### Action

Detailed review of first draft

Detailed review of proposed amendments and revised draft

Formulation of proposed amendments on behalf of the EU Fishmeal industry

Participation in TWG meetings when relevant

Participation in Article 13 Forum meetings when relevant

The amount of time of assistance is expected to be approximately 1 day / week from the kick-off meeting until the the BREF document is ready.